

# **EXHIBIT C**

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6  
7 **UNITED STATES DISTRICT COURT**  
8 **NORTHERN DISTRICT OF CALIFORNIA**

9 OCEAN SEMICONDUCTOR LLC,  
10 Plaintiff,

11 v.

12 MEDIATEK INC. AND MEDIATEK USA  
13 INC.,  
14 Defendants.

Case No. 6:20-cv-1210-ADA  
(Pending in W.D. Tex.)

**NON-PARTY UMC GROUP (USA)'S  
OBJECTIONS AND RESPONSES TO  
OCEAN SEMICONDUCTOR LLC'S  
SUBPOENA TO TESTIFY AT A  
DEPOSITION IN A CIVIL ACTION**

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16 Pursuant to Rules 26, 30, 34 and 45 of the Federal Rules of Civil Procedure, non-party  
17 UMC Group (USA) hereby responds and objects to the Subpoena to Testify at a Deposition in a  
18 Civil Action ("Subpoena") which was issued by Plaintiff Ocean Semiconductor LLC ("Ocean"  
19 or "Plaintiff") in the above-captioned action and served on UMC Group (USA) at its offices in  
20 Sunnyvale, California on December 22, 2021. The Subpoena seeks deposition testimony from  
21 UMC Group (USA) on eleven Deposition Topics (each a "Topic" and collectively the "Topics")  
22 listed in Attachment A to the Subpoena, and production by UMC Group (USA) of documents,  
23 electronically stored information ("ESI"), or objects described in forty-five Requests for  
24 Production of Documents (each a "Request" and collectively the "Requests") also listed in  
25 Attachment A.  
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**PRELIMINARY STATEMENT**

A. The following objections and responses are based on UMC Group (USA)'s current knowledge, information and belief after making a reasonable inquiry within the time allotted by the Subpoena. UMC Group (USA)'s investigation into this matter is ongoing, and UMC Group (USA) is willing to meet and confer with Ocean regarding the scope of the documents and deposition testimony sought. UMC Group (USA) reserves the right to supplement its objections and responses to the Subpoena to the extent additional or different information becomes available.

B. UMC Group (USA)'s objections and response to a particular Request or Topic shall not be interpreted as implying that documents responsive to the Request exist or that information covered by the Topic is known or reasonably available to UMC Group (USA), or that UMC Group (USA) acknowledges the appropriateness of the Request or Topic. Nothing in these objections or responses should be construed as a waiver of any rights of UMC Group (USA) under applicable rules and governing laws.

C. Any production of information by UMC Group (USA) in response to the Subpoena will be made pursuant to the Protective Order governing the disclosure of confidential information in the underlying action. UMC Group (USA) reserves the right to insist upon supplemental protections.

D. UMC Group (USA)'s offices are located within the Northern District of California, not within the Western District of Texas where the underlying action is pending. Pursuant to Federal Rule of Civil Procedure 45, the United States District Court for the Northern District of California is the governing district for purposes of the Subpoena and any related motions. Nothing in these objections and responses, and no request by UMC Group (USA) for additional protections through entry of a supplemental protective order, should be construed as a waiver of the jurisdiction of the Northern District of California.

**GENERAL OBJECTIONS**

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2 1. UMC Group (USA) objects to the time, place, and manner specified in the  
3 Subpoena for appearing for a deposition and producing documents to the extent they are  
4 inconvenient and unduly burdensome to UMC Group (USA). UMC Group (USA) will appear  
5 for a deposition and produce documents, if at all, at a time and location, and in a manner, to be  
6 agreed upon by UMC Group (USA) and Ocean.

7 2. UMC Group (USA) objects to each Request and Topic to the extent it seeks to  
8 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of  
9 Civil Procedure, the Civil Local Rules of the United States District Court for the Northern  
10 District of California, or any other applicable rule or law.

11 3. UMC Group (USA) objects to each Request and Topic the extent it seeks  
12 information that is protected from discovery by the attorney-client privilege, the attorney work-  
13 product doctrine, or any other applicable privilege or immunity.

14 4. UMC Group (USA) objects to each Request and Topic to the extent it seeks trade  
15 secret and/or other confidential research, development, or commercial information. Any  
16 production of information by UMC Group (USA) in response to the Subpoena will made  
17 pursuant to the Protective Order governing the disclosure of confidential information in the  
18 underlying action. UMC Group (USA) reserves the right to insist upon supplemental  
19 protections.

20 5. UMC Group (USA) objects to each Request and Topic to the extent it seeks  
21 information not in UMC Group (USA)'s possession, custody or control.

22 6. UMC Group (USA) objects to each Request and Topic to the extent it seeks  
23 information that is available from one or more parties to the underlying action and/or from public  
24 sources.

25 7. UMC Group (USA) objects to each Request and Topic to the extent it seeks  
26 information that is more readily and/or appropriately available from, or confidential to, another  
27 non-party.  
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1 persons other than Ocean Semiconductor LLC. For purposes of these objections and responses,  
2 UMC Group (USA) will interpret these terms to mean only Ocean Semiconductor LLC.

3 3. UMC Group (USA) objects to the definition of “ASML” as overbroad, vague and  
4 ambiguous, calling for a legal conclusion, providing insufficient identification and specificity,  
5 requiring subjective judgment and speculation, and seeking to impose duties or obligations  
6 beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the  
7 extent it covers entities and persons other than ASML Holding N.V. and ASML Netherlands  
8 B.V. For purposes of these objections and responses, UMC Group (USA) will interpret this term  
9 to mean only ASML Holding N.V. and ASML Netherlands B.V.

10 4. UMC Group (USA) objects to the definition of “Applied Materials” as overbroad,  
11 vague and ambiguous, calling for a legal conclusion, providing insufficient identification and  
12 specificity, requiring subjective judgment and speculation, and seeking to impose duties or  
13 obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at  
14 least to the extent it covers entities and persons other than Applied Materials, Inc. For purposes  
15 of these objections and responses, UMC Group (USA) will interpret this term to mean only  
16 Applied Materials, Inc.

17 5. UMC Group (USA) objects to the definition of “PDF Solutions” as overbroad,  
18 vague and ambiguous, calling for a legal conclusion, providing insufficient identification and  
19 specificity, requiring subjective judgment and speculation, and seeking to impose duties or  
20 obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at  
21 least to the extent it covers entities and persons other than PDF Solutions, Inc. For purposes of  
22 these objections and responses, UMC Group (USA) will interpret this term to mean only PDF  
23 Solutions, Inc.

24 6. UMC Group (USA) objects to the definition of “Defendant” and “Defendants” as  
25 overbroad, vague and ambiguous, calling for a legal conclusion, providing insufficient  
26 identification and specificity, requiring subjective judgment and speculation, and seeking to  
27 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of  
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1 Civil Procedure, at least to the extent it covers entities and persons other than MediaTek Inc.,  
 2 MediaTek USA Inc., NVIDIA Corporation, NXP USA, Inc., Renesas Electronics Corporation,  
 3 Renesas Electronics America, Inc., Silicon Laboratories Inc., STMicroelectronics, Inc., Western  
 4 Digital Technologies, Inc., Huawei Device USA, Inc., Huawei Device Co., Ltd., HiSilicon  
 5 Technologies Co., Ltd., Analog Devices, Inc., Infineon Technologies AG, and Infineon  
 6 Technologies Americas Corp. For purposes of these objections and responses, UMC Group  
 7 (USA) will interpret these terms to mean only MediaTek Inc., MediaTek USA Inc., NVIDIA  
 8 Corporation, NXP USA, Inc., Renesas Electronics Corporation, Renesas Electronics America,  
 9 Inc., Silicon Laboratories Inc., STMicroelectronics, Inc., Western Digital Technologies, Inc.,  
 10 Huawei Device USA, Inc., Huawei Device Co., Ltd., HiSilicon Technologies Co., Ltd., Analog  
 11 Devices, Inc., Infineon Technologies AG, and Infineon Technologies Americas Corp.

12 7. UMC Group (USA) objects to the definitions of “Mediatek Infringing  
 13 Instrumentalities,” “NVIDIA Infringing Instrumentalities,” “NXP Infringing Instrumentalities,”  
 14 “Renesas Infringing Instrumentalities,” “STMicro Infringing Instrumentalities,” “Silicon Labs  
 15 Infringing Instrumentalities,” “Western Digital Infringing Instrumentalities,” “Huawei Infringing  
 16 Instrumentalities,” and “Infringing Instrumentalities” as overbroad, vague and ambiguous,  
 17 calling for a legal conclusion, providing insufficient identification and specificity, requiring  
 18 subjective judgment and speculation, and seeking to impose duties or obligations beyond or  
 19 inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent  
 20 they list product identifiers that are unfamiliar to UMC Group (USA) and therefore would  
 21 require UMC Group (USA) to speculate about what product(s) are associated with those product  
 22 identifiers and about the identity of the manufacturer(s) of those products, and to the extent they  
 23 would require UMC Group (USA) to speculate about what constitutes “similar systems,  
 24 products, devices, and integrated circuits.” UMC Group (USA) further objects to the definitions  
 25 of these terms as overbroad and vague and ambiguous, at least to the extent they improperly  
 26 suggest that any products associated with the listed product identifiers infringe the Asserted  
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1 Patents. Alleged infringement of the Asserted Patents has not yet been adjudicated in the  
2 underlying action.

3 8. UMC Group (USA) objects to the definitions of “person,” “documents,” “thing,”  
4 “sale,” “sold,” “communication,” “identify,” “identity,” “information,” “describe,” “date,”  
5 “relate to,” “related to,” “relating to,” “concerning,” and “possession,” at least to the extent they  
6 seek to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
7 Rules of Civil Procedure, the Civil Local Rules of the United States District Court for the  
8 Northern District of California, or any other applicable rule or law. For purposes of these  
9 objections and responses, UMC Group (USA) will interpret these terms in a manner consistent  
10 with Federal Rules of Civil Procedure, the Civil Local Rules of the United States District Court  
11 for the Northern District of California, and any other applicable rules and laws.

12 9. UMC Group (USA) objects to the definition of “Advanced Process Control” and  
13 “APC” as overbroad, vague and ambiguous, calling for a legal conclusion, providing insufficient  
14 identification and specificity, requiring subjective judgment and speculation, and seeking to  
15 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of  
16 Civil Procedure, at least to the extent it would require UMC Group (USA) to speculate about  
17 what constitutes “any computer integrated system or factory automation hardware or software for  
18 monitoring and/or controlling processes and tools,” to the extent it covers systems, hardware,  
19 and/or software that has not been identified by Ocean in its pleadings or in its Preliminary  
20 Disclosure of Asserted Claims and Infringement Contentions in the underlying action and/or  
21 does not perform the accused functionalities claimed in any of the Asserted Patents, and to the  
22 extent it is inconsistent with any use of this term or similar terms in any of the Asserted Patents,  
23 or in any claim construction order or other orders entered in the underlying action.

24 10. UMC Group (USA) objects to the definition of “Fault Detection and  
25 Classification” and “FDC” as overbroad, vague and ambiguous, calling for a legal conclusion,  
26 providing insufficient identification and specificity, requiring subjective judgment and  
27 speculation, and seeking to impose duties or obligations beyond or inconsistent with those set  
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1 forth in the Federal Rules of Civil Procedure, at least to the extent it would require UMC Group  
 2 (USA) to speculate about what constitutes “any computer integrated hardware or software for the  
 3 detection and/or classification of manufacturing-related fault events,” to the extent it covers  
 4 systems, hardware, and/or software that has not been identified by Ocean in its pleadings or in its  
 5 Preliminary Disclosure of Asserted Claims and Infringement Contentions in the underlying  
 6 action and/or does not perform the accused functionalities claimed in any of the Asserted  
 7 Patents, and to the extent it is inconsistent with any use of this term or similar terms in any of the  
 8 Asserted Patents, or in any claim construction order or other orders entered in the underlying  
 9 action.

10 11. UMC Group (USA) objects to the definition of “YieldStar” as overbroad, vague  
 11 and ambiguous, calling for a legal conclusion, providing insufficient identification and  
 12 specificity, requiring subjective judgment and speculation, and seeking to impose duties or  
 13 obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at  
 14 least to the extent it would require UMC Group (USA) to speculate about what constitutes “any  
 15 and all metrology and inspection systems designed, developed, assembled, and/or manufactured  
 16 by ASML,” “ASML’s optical metrology systems,” “E-beam metrology and inspection systems,”  
 17 and “all models, versions, and their predecessors,” and to the extent it covers systems, hardware,  
 18 and/or software that has not been identified by Ocean in its pleadings or in its Preliminary  
 19 Disclosure of Asserted Claims and Infringement Contentions in the underlying action and/or  
 20 does not perform the accused functionalities claimed in any of the Asserted Patents.

21 12. UMC Group (USA) objects to the definition of “TWINSCAN” as overbroad,  
 22 vague and ambiguous, calling for a legal conclusion, providing insufficient identification and  
 23 specificity, requiring subjective judgment and speculation, and seeking to impose duties or  
 24 obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at  
 25 least to the extent it would require UMC Group (USA) to speculate about what constitutes “any  
 26 and all lithography systems designed, developed, assembled, and/or manufactured by ASML,”  
 27 “ASML’s deep ultraviolet (DUV) lithography systems,” “extreme ultraviolet (EUV) lithography  
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1 systems,” “lithography systems that utilize more than one wafer table,” and “their predecessors,”  
2 and to the extent it covers systems, hardware, and/or software that has not been identified by  
3 Ocean in its pleadings or in its Preliminary Disclosure of Asserted Claims and Infringement  
4 Contentions in the underlying action and/or does not perform the accused functionalities claimed  
5 in any of the Asserted Patents.

6 13. UMC Group (USA) objects to the definition of “E3” as overbroad, vague and  
7 ambiguous, calling for a legal conclusion, providing insufficient identification and specificity,  
8 requiring subjective judgment and speculation, and seeking to impose duties or obligations  
9 beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the  
10 extent it would require UMC Group (USA) to speculate about what constitutes “Applied  
11 Materials’ E3 framework, platform, hardware, and/or software and all equipment modules of E3”  
12 and “all models, versions, and their predecessors,” and to the extent it covers systems, hardware,  
13 and/or software that has not been identified by Ocean in its pleadings or in its Preliminary  
14 Disclosure of Asserted Claims and Infringement Contentions in the underlying action and/or  
15 does not perform the accused functionalities claimed in any of the Asserted Patents.

16 14. UMC Group (USA) objects to the definition of “SmartFactory” as overbroad,  
17 vague and ambiguous, calling for a legal conclusion, providing insufficient identification and  
18 specificity, requiring subjective judgment and speculation, and seeking to impose duties or  
19 obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at  
20 least to the extent it would require UMC Group (USA) to speculate about what constitutes  
21 “Applied Materials’ SmartFactory Productivity Solution framework, platform, hardware and/or  
22 software and all equipment modules of SmartFactory” and “all models, versions, and their  
23 predecessors,” and to the extent it covers systems, hardware, and/or software that has not been  
24 identified by Ocean in its pleadings or in its Preliminary Disclosure of Asserted Claims and  
25 Infringement Contentions in the underlying action and/or does not perform the accused  
26 functionalities claimed in any of the Asserted Patents.

1           15.     UMC Group (USA) objects to the definition of “Exensio” as overbroad, vague  
2 and ambiguous, calling for a legal conclusion, providing insufficient identification and  
3 specificity, requiring subjective judgment and speculation, and seeking to impose duties or  
4 obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at  
5 least to the extent it would require UMC Group (USA) to speculate about what constitutes “PDF  
6 Solutions’ Exensio framework, platform, hardware and/or software and all equipment modules  
7 of Exensio” and “all models, versions, and their predecessors,” and to the extent it covers  
8 systems, hardware, and/or software that has not been identified by Ocean in its pleadings or in its  
9 Preliminary Disclosure of Asserted Claims and Infringement Contentions in the underlying  
10 action and/or does not perform the accused functionalities claimed in any of the Asserted  
11 Patents.

12           16.     UMC Group (USA) objects to the definition of “Manufacturing Equipment” as  
13 overbroad, vague and ambiguous, calling for a legal conclusion, providing insufficient  
14 identification and specificity, requiring subjective judgment and speculation, and seeking to  
15 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of  
16 Civil Procedure, at least to the extent it refers to “TWINSCAN,” “YieldStar,” “E3,”  
17 “SmartFactory,” and “Exensio,” for the same reasons as provided herein for those terms  
18 individually, and to the extent it would require UMC Group (USA) to speculate about what  
19 constitutes “their respective frameworks, platforms, hardware and/or software and all equipment  
20 modules.”

21           17.     UMC Group (USA) objects to the definition of “Equipment Manufacturers” as  
22 overbroad, vague and ambiguous, calling for a legal conclusion, providing insufficient  
23 identification and specificity, requiring subjective judgment and speculation, and seeking to  
24 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of  
25 Civil Procedure, at least to the extent it refers to “Manufacturing Equipment,” for the same  
26 reasons as provided herein for that term.  
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1           18.     UMC Group (USA) objects to the definition of “MES” as overbroad, vague and  
2 ambiguous, calling for a legal conclusion, providing insufficient identification and specificity,  
3 requiring subjective judgment and speculation, and seeking to impose duties or obligations  
4 beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the  
5 extent it would require UMC Group (USA) to speculate about what constitutes “any and all  
6 manufacturing execution system used for monitoring, tracking, and/or documenting the process  
7 of manufacturing, fabricating, and/or assembling,” to the extent it covers systems, hardware,  
8 and/or software that has not been identified by Ocean in its pleadings or in its Preliminary  
9 Disclosure of Asserted Claims and Infringement Contentions in the underlying action and/or  
10 does not perform the accused functionalities claimed in any of the Asserted Patents, and to the  
11 extent it is inconsistent with any use of this term or similar terms in any of the Asserted Patents,  
12 or in any claim construction order or other orders entered in the underlying action.

13           19.     UMC Group (USA) objects to the definition of “Product” and “Products” as  
14 overbroad, vague and ambiguous, calling for a legal conclusion, providing insufficient  
15 identification and specificity, requiring subjective judgment and speculation, and seeking to  
16 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of  
17 Civil Procedure, at least to the extent it would require UMC Group (USA) to speculate about  
18 what constitutes “any and all components, subcomponents, auxiliary components, and accessory  
19 products,” and to the extent it covers systems, hardware, and/or software that has not been  
20 identified by Ocean in its pleadings or in its Preliminary Disclosure of Asserted Claims and  
21 Infringement Contentions in the underlying action and/or does not perform the accused  
22 functionalities claimed in any of the Asserted Patents.

### 23                                   **OBJECTIONS TO INSTRUCTIONS**

24           1.     UMC Group (USA) objects to the Instructions in Attachment A to the Subpoena  
25 to the extent they seek to impose duties or obligations beyond or inconsistent with those set forth  
26 in the Federal Rules of Civil Procedure, the Civil Local Rules of the United States District Court  
27 for the Northern District of California, or any other applicable rule or law.  
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**SPECIFIC OBJECTIONS AND RESPONSES TO REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

**REQUEST NO. 1:**

Documents sufficient to show the use, utilization, installation, implementation, and/or deployment of ASML's TWINSCAN lithography system and/or YieldStar metrology system in any of Your manufacturing and/or fabrication facility in connection with Your manufacture, fabrication, and/or assembly of any and all Infringing Instrumentalities for any Defendant, including the identification of all versions and models of any such system and the location of such use, utilization, installation, implementation, and/or deployment including the location of any and all such fabrication facilities.

**OBJECTIONS AND RESPONSE TO REQUEST NO. 1:**

UMC Group (USA) incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further objects to this Request to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC Group (USA) further objects to this Request to the extent it seeks information not in UMC Group (USA)'s possession, custody or control.

UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party's claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it seeks information about "ASML's TWINSCAN lithography system and/or YieldStar metrology system," about "Your manufacturing and/or fabrication facility," about "any and all Infringing Instrumentalities," and about "any Defendant."

1 UMC Group (USA) further objects to this Request as seeking information that is more  
2 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
3 extent it seeks information about “ASML’s TWINSCAN lithography system and/or YieldStar  
4 metrology system.”

5 UMC Group (USA) further objects to this Request as seeking information that that is  
6 available from one or more parties to the underlying action, and duplicative of other discovery  
7 already taken or requested in the underlying action, at least to the extent it seeks information  
8 about “any and all Infringing Instrumentalities for any Defendant.”

9 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
10 confidential research, development, or commercial information, at least to the extent it seeks  
11 information about “use, utilization, installation, implementation, and/or deployment of ASML’s  
12 TWINSCAN lithography system and/or YieldStar metrology system in any of Your  
13 manufacturing and/or fabrication facility,” about “Your manufacture, fabrication, and/or  
14 assembly of any and all Infringing Instrumentalities for any Defendant,” and about  
15 “identification of all versions and models of any such system and the location of such use,  
16 utilization, installation, implementation, and/or deployment including the location of any and all  
17 such fabrication facilities.” Any production of information by UMC Group (USA) in response to  
18 the Subpoena will made pursuant to the Protective Order governing the disclosure of confidential  
19 information in the underlying action. UMC Group (USA) reserves the right to insist upon  
20 supplemental protections.

21 Subject to and without waiving these specific objections or the foregoing General  
22 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
23 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
24 documents.

25 **REQUEST NO. 2:**

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Purchase or sales orders, invoices, purchase agreements, sales agreements, and/or supplier agreements relating to any TWINSCAN and/or YieldStar system(s) as described in Request for Production No. 1 between You and ASML.

**OBJECTIONS AND RESPONSE TO REQUEST NO. 2:**

UMC Group (USA) incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further objects to this Request to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC Group (USA) further objects to this Request to the extent it seeks information not in UMC Group (USA)'s possession, custody or control.

UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party's claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it seeks information about "any TWINSCAN and/or YieldStar system(s)," and about "ASML."

UMC Group (USA) further objects to this Request as seeking information that is more readily and/or appropriately available from, or confidential to, another non-party, at least to the extent it seeks information about "[p]urchase or sales orders, invoices, purchase agreements, sales agreements, and/or supplier agreements ... between You and ASML."

UMC Group (USA) further objects to this Request as seeking trade secret and/or other confidential research, development, or commercial information, at least to the extent it seeks information about "[p]urchase or sales orders, invoices, purchase agreements, sales agreements, and/or supplier agreements relating to any TWINSCAN and/or YieldStar system(s)." Any production of information by UMC Group (USA) in response to the Subpoena will be made pursuant to the Protective Order governing the disclosure of confidential information in the



1 underlying action. UMC Group (USA) reserves the right to insist upon supplemental  
2 protections.

3 Subject to and without waiving these specific objections or the foregoing General  
4 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
5 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
6 documents.

7 **REQUEST NO. 3:**

8 Documents sufficient to show the identity and role played by any and all Defendants in  
9 the design, development, manufacture, testing, and/or importation of the Infringing  
10 Instrumentalities that are/were fabricated, manufactured, and/or assembled by You using any  
11 TWINSCAN and/or YieldStar system(s) as described in Request for Production No. 1.

12 **OBJECTIONS AND RESPONSE TO REQUEST NO. 3:**

13 UMC Group (USA) incorporates each of its General Objections, Objections to  
14 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
15 objects to this Request to the extent it seeks information that is protected from discovery by the  
16 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
17 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
18 not in UMC Group (USA)'s possession, custody or control.

19 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
20 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
21 identification and specificity, requiring subjective judgment and speculation, seeking information  
22 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
23 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
24 Rules of Civil Procedure, at least to the extent it seeks information about "any and all  
25 Defendants," about "Infringing Instrumentalities," and about "any TWINSCAN and/or YieldStar  
26 system(s)."  
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1 UMC Group (USA) further objects to this Request as seeking information that is more  
2 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
3 extent it seeks information about “any TWINSCAN and/or YieldStar system(s).”

4 UMC Group (USA) further objects to this Request as seeking information that that is  
5 available from one or more parties to the underlying action, and duplicative of other discovery  
6 already taken or requested in the underlying action, at least to the extent it seeks information  
7 about “the identity and role played by any and all Defendants,” and about “Infringing  
8 Instrumentalities.”

9 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
10 confidential research, development, or commercial information, at least to the extent it seeks  
11 information about “the design, development, manufacture, testing, and/or importation of the  
12 Infringing Instrumentalities that are/were fabricated, manufactured, and/or assembled by You  
13 using any TWINSCAN and/or YieldStar system(s).” Any production of information by UMC  
14 Group (USA) in response to the Subpoena will made pursuant to the Protective Order governing  
15 the disclosure of confidential information in the underlying action. UMC Group (USA) reserves  
16 the right to insist upon supplemental protections.

17 Subject to and without waiving these specific objections and the foregoing General  
18 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
19 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
20 documents.

21 **REQUEST NO. 4:**

22 Documents sufficient to identify any and all systems, devices, components, and/or  
23 integrated circuits manufactured, fabricated, and/or assembled by, or on behalf of, any and all  
24 Defendants using any TWINSCAN and/or YieldStar system(s) as described in Request for  
25 Production No. 1, including the identification of any and all applicable technology node(s) for  
26 which such system is/was used in such manufacture, fabrication, or assembly.

**OBJECTIONS AND RESPONSE TO REQUEST NO. 4:**

UMC Group (USA) incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further objects to this Request to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC Group (USA) further objects to this Request to the extent it seeks information not in UMC Group (USA)'s possession, custody or control.

UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party's claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it seeks information about "any and all Defendants," and about "any TWINSCAN and/or YieldStar system(s)."

UMC Group (USA) further objects to this Request as seeking information that is more readily and/or appropriately available from, or confidential to, another non-party, at least to the extent it seeks information about "any TWINSCAN and/or YieldStar system(s)."

UMC Group (USA) further objects to this Request as seeking information that that is available from one or more parties to the underlying action, and duplicative of other discovery already taken or requested in the underlying action, at least to the extent it seeks information about "any and all systems, devices, components, and/or integrated circuits manufactured, fabricated, and/or assembled by, or on behalf of, any and all Defendants."

UMC Group (USA) further objects to this Request as seeking trade secret and/or other confidential research, development, or commercial information, at least to the extent it seeks information about "any and all systems, devices, components, and/or integrated circuits manufactured, fabricated, and/or assembled or on behalf of, any and all Defendants using any TWINSCAN and/or YieldStar system(s)" and about "identification of any and all applicable

1 technology node(s) for which such system is/was used in such manufacture, fabrication, or  
2 assembly.” Any production of information by UMC Group (USA) in response to the Subpoena  
3 will made pursuant to the Protective Order governing the disclosure of confidential information  
4 in the underlying action. UMC Group (USA) reserves the right to insist upon supplemental  
5 protections.

6 Subject to and without waiving these specific objections and the foregoing General  
7 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
8 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
9 documents.

10 **REQUEST NO. 5:**

11 Documents relating to Your agreement or contract with any and all Defendants to  
12 fabricate, manufacture, or assemble those systems, devices, components, and/or integrated  
13 circuits described in Request for Production No. 4, including, without limitation, master service  
14 agreements, partnership agreements, development agreements, contract manufacturing  
15 agreements, manufacturing supply agreements, supplier agreements, distribution agreements,  
16 manufacturing contract service level agreements, and semiconductor purchase agreements.

17 **OBJECTIONS AND RESPONSE TO REQUEST NO. 5:**

18 UMC Group (USA) incorporates each of its General Objections, Objections to  
19 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
20 objects to this Request to the extent it seeks information that is protected from discovery by the  
21 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
22 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
23 not in UMC Group (USA)’s possession, custody or control.

24 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
25 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
26 identification and specificity, requiring subjective judgment and speculation, seeking information  
27 that is not relevant to any party’s claim or defense and proportional to the needs of the case, and  
28

1 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
 2 Rules of Civil Procedure, at least to the extent it seeks information about “any and all  
 3 Defendants,” and about “those systems, devices, components, and/or integrated circuits  
 4 described in Request for Production No. 4.”

5 UMC Group (USA) further objects to this Request as seeking information that that is  
 6 available from one or more parties to the underlying action, and duplicative of other discovery  
 7 already taken or requested in the underlying action, at least to the extent it seeks information  
 8 about “Your agreement or contract with any and all Defendants.”

9 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
 10 confidential research, development, or commercial information, at least to the extent it seeks  
 11 information about “Your agreement or contract with any and all Defendants to fabricate,  
 12 manufacture, or assemble those systems, devices, components, and/or integrated circuits  
 13 described in Request for Production No. 4,” and about “master service agreements, partnership  
 14 agreements, development agreements, contract manufacturing agreements, manufacturing supply  
 15 agreements, supplier agreements, distribution agreements, manufacturing contract service level  
 16 agreements, and semiconductor purchase agreements.” Any production of information by UMC  
 17 Group (USA) in response to the Subpoena will made pursuant to the Protective Order governing  
 18 the disclosure of confidential information in the underlying action. UMC Group (USA) reserves  
 19 the right to insist upon supplemental protections.

20 Subject to and without waiving these specific objections and the foregoing General  
 21 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
 22 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
 23 documents that would not also be available from one or more parties to the underlying action,  
 24 and therefore UMC Group (USA) will not produce any documents in response to this topic.

25 **REQUEST NO. 6:**

26 Documents relating to, or reflecting, any agreement between You and ASML to be  
 27 indemnified by, or to indemnify, ASML for patent infringement in connection with Your use,  
 28

utilization, installation, implementation, and/or deployment of ASML's TWINSCAN and/or YieldStar system(s) as described in Request for Production No. 1.

**OBJECTIONS AND RESPONSE TO REQUEST NO. 6:**

UMC Group (USA) incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further objects to this Request to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC Group (USA) further objects to this Request to the extent it seeks information not in UMC Group (USA)'s possession, custody or control.

UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party's claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it seeks information about "ASML," and about "ASML's TWINSCAN and/or YieldStar system(s) as described in Request for Production No. 1."

UMC Group (USA) further objects to this Request as seeking information that is more readily and/or appropriately available from, or confidential to, another non-party, at least to the extent it seeks information about "any agreement between You and ASML," and about "ASML's TWINSCAN and/or YieldStar system(s) as described in Request for Production No. 1."

UMC Group (USA) further objects to this Request as seeking trade secret and/or other confidential research, development, or commercial information, at least to the extent it seeks information about "any agreement between You and ASML to be indemnified by, or to indemnify, ASML for patent infringement," and about "Your use, utilization, installation, implementation, and/or deployment of ASML's TWINSCAN and/or YieldStar system(s) as described in Request for Production No. 1." Any production of information by UMC Group

(USA) in response to the Subpoena will made pursuant to the Protective Order governing the disclosure of confidential information in the underlying action. UMC Group (USA) reserves the right to insist upon supplemental protections.

Subject to and without waiving these specific objections and the foregoing General Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA) responds that following a reasonable search, it has no non-privileged, relevant, responsive documents.

**REQUEST NO. 7:**

Documents sufficient to show the use, utilization, installation, implementation, and/or deployment of Applied Materials' APC and/or FDC hardware, software, systems, components, and/or modules, including without limitation, Applied Materials' E3 system and/or Smart Factory system, in any of Your manufacture, fabrication, and/or assembly tool, equipment and/or facility in connection with Your manufacture, fabrication, and/or assembly of any and all Infringing Instrumentalities for any Defendant, including the identification of all versions and models of any such system and the location of such use, utilization, installation, implementation, and/or deployment including the location of any and all manufacturing and/or fabrication facilities.

**OBJECTIONS AND RESPONSE TO REQUEST NO. 7:**

UMC Group (USA) incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further objects to this Request to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC Group (USA) further objects to this Request to the extent it seeks information not in UMC Group (USA)'s possession, custody or control.

UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information

1 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
2 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
3 Rules of Civil Procedure, at least to the extent it seeks information about "Applied Materials'  
4 APC and/or FDC hardware, software, systems, components, and/or modules, including without  
5 limitation, Applied Materials' E3 system and/or Smart Factory system," about "Your  
6 manufacture, fabrication, and/or assembly tool, equipment and/or facility," about "any and all  
7 Infringing Instrumentalities," and about "any Defendant."

8 UMC Group (USA) further objects to this Request as seeking information that is more  
9 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
10 extent it seeks information about "Applied Materials' APC and/or FDC hardware, software,  
11 systems, components, and/or modules, including without limitation, Applied Materials' E3  
12 system and/or Smart Factory system."

13 UMC Group (USA) further objects to this Request as seeking information that that is  
14 available from one or more parties to the underlying action, and duplicative of other discovery  
15 already taken or requested in the underlying action, at least to the extent it seeks information  
16 about "any and all Infringing Instrumentalities for any Defendant."

17 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
18 confidential research, development, or commercial information, at least to the extent it seeks  
19 information about "use, utilization, installation, implementation, and/or deployment of Applied  
20 Materials' APC and/or FDC hardware, software, systems, components, and/or modules,  
21 including without limitation, Applied Materials' E3 system and/or Smart Factory system, in any  
22 of Your manufacture, fabrication, and/or assembly tool, equipment and/or facility," about "Your  
23 manufacture, fabrication, and/or assembly of any and all Infringing Instrumentalities for any  
24 Defendant," and about "identification of all versions and models of any such system and the  
25 location of such use, utilization, installation, implementation, and/or deployment including the  
26 location of any and all manufacturing and/or fabrication facilities." Any production of  
27 information by UMC Group (USA) in response to the Subpoena will made pursuant to the  
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1 Protective Order governing the disclosure of confidential information in the underlying action.  
2 UMC Group (USA) reserves the right to insist upon supplemental protections.

3 Subject to and without waiving these specific objections and the foregoing General  
4 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
5 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
6 documents.

7 **REQUEST NO. 8:**

8 Purchase or sales orders, invoices, purchase agreements, sales agreements, and/or  
9 supplier agreements relating to any Applied Materials APC and/or FDC hardware, software,  
10 systems, components, and/or modules, including the E3 and/or Smart Factory system(s), as  
11 described in Request for Production No. 7 between You and Applied Materials.

12 **OBJECTIONS AND RESPONSE TO REQUEST NO. 8:**

13 UMC Group (USA) incorporates each of its General Objections, Objections to  
14 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
15 objects to this Request to the extent it seeks information that is protected from discovery by the  
16 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
17 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
18 not in UMC Group (USA)'s possession, custody or control.

19 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
20 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
21 identification and specificity, requiring subjective judgment and speculation, seeking information  
22 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
23 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
24 Rules of Civil Procedure, at least to the extent it seeks information about "any Applied Materials  
25 APC and/or FDC hardware, software, systems, components, and/or modules, including the E3  
26 and/or Smart Factory system(s)," and about "Applied Materials."



1 UMC Group (USA) further objects to this Request as seeking information that is more  
 2 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
 3 extent it seeks information about “[p]urchase or sales orders, invoices, purchase agreements,  
 4 sales agreements, and/or supplier agreements ... between You and Applied Materials.”

5 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
 6 confidential research, development, or commercial information, at least to the extent it seeks  
 7 information about “[p]urchase or sales orders, invoices, purchase agreements, sales agreements,  
 8 and/or supplier agreements relating to any Applied Materials APC and/or FDC hardware,  
 9 software, systems, components, and/or modules, including the E3 and/or Smart Factory  
 10 system(s).” Any production of information by UMC Group (USA) in response to the Subpoena  
 11 will be made pursuant to the Protective Order governing the disclosure of confidential information  
 12 in the underlying action. UMC Group (USA) reserves the right to insist upon supplemental  
 13 protections.

14 Subject to and without waiving these specific objections and the foregoing General  
 15 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
 16 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
 17 documents.

18 **REQUEST NO. 9:**

19 Documents sufficient to show the identity and role played by any and all Defendants in  
 20 the design, development, manufacture, testing, and/or importation of the Infringing  
 21 Instrumentalities that are/were fabricated, manufactured, and/or assembled by You using any  
 22 Applied Materials APC and/or FDC hardware, software, systems, components, and/or modules,  
 23 as described in Request for Production No. 7, including the E3 and/or Smart Factory system(s).

24 **OBJECTIONS AND RESPONSE TO REQUEST NO. 9:**

25 UMC Group (USA) incorporates each of its General Objections, Objections to  
 26 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
 27 objects to this Request to the extent it seeks information that is protected from discovery by the  
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1 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
2 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
3 not in UMC Group (USA)'s possession, custody or control.

4 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
5 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
6 identification and specificity, requiring subjective judgment and speculation, seeking information  
7 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
8 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
9 Rules of Civil Procedure, at least to the extent it seeks information about "any and all  
10 Defendants," about "Infringing Instrumentalities," and about "any Applied Materials APC and/or  
11 FDC hardware, software, systems, components, and/or modules, ..., including the E3 and/or  
12 Smart Factory system(s)."

13 UMC Group (USA) further objects to this Request as seeking information that is more  
14 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
15 extent it seeks information about "any Applied Materials APC and/or FDC hardware, software,  
16 systems, components, and/or modules, ..., including the E3 and/or Smart Factory system(s)."

17 UMC Group (USA) further objects to this Request as seeking information that that is  
18 available from one or more parties to the underlying action, and duplicative of other discovery  
19 already taken or requested in the underlying action, at least to the extent it seeks information  
20 about "the identity and role played by any and all Defendants," and about "Infringing  
21 Instrumentalities."

22 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
23 confidential research, development, or commercial information, at least to the extent it seeks  
24 information about "the design, development, manufacture, testing, and/or importation of the  
25 Infringing Instrumentalities that are/were fabricated, manufactured, and/or assembled by You  
26 using any Applied Materials APC and/or FDC hardware, software, systems, components, and/or  
27 modules, ..., including the E3 and/or Smart Factory system(s)." Any production of information  
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1 by UMC Group (USA) in response to the Subpoena will made pursuant to the Protective Order  
 2 governing the disclosure of confidential information in the underlying action. UMC Group  
 3 (USA) reserves the right to insist upon supplemental protections.

4 Subject to and without waiving these specific objections and the foregoing General  
 5 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
 6 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
 7 documents.

8 **REQUEST NO. 10:**

9 Documents sufficient to identify any and all systems, devices, components, and/or  
 10 integrated circuits manufactured, fabricated, and/or assembled on behalf of any and all  
 11 Defendants using any Applied Materials APC and/or FDC hardware, software, systems,  
 12 components, and/or modules, including the E3 and/or Smart Factory system(s), as described in  
 13 Request for Production No. 7, including the identification of any and all applicable technology  
 14 node(s) for which each such system is/was used.

15 **OBJECTIONS AND RESPONSE TO REQUEST NO. 10:**

16 UMC Group (USA) incorporates each of its General Objections, Objections to  
 17 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
 18 objects to this Request to the extent it seeks information that is protected from discovery by the  
 19 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
 20 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
 21 not in UMC Group (USA)'s possession, custody or control.

22 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
 23 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
 24 identification and specificity, requiring subjective judgment and speculation, seeking information  
 25 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
 26 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
 27 Rules of Civil Procedure, at least to the extent it seeks information about "any and all  
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1 Defendants,” and about “any Applied Materials APC and/or FDC hardware, software, systems,  
2 components, and/or modules, including the E3 and/or Smart Factory system(s).”

3 UMC Group (USA) further objects to this Request as seeking information that is more  
4 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
5 extent it seeks information about “any Applied Materials APC and/or FDC hardware, software,  
6 systems, components, and/or modules, including the E3 and/or Smart Factory system(s).”

7 UMC Group (USA) further objects to this Request as seeking information that that is  
8 available from one or more parties to the underlying action, and duplicative of other discovery  
9 already taken or requested in the underlying action, at least to the extent it seeks information  
10 about “any and all systems, devices, components, and/or integrated circuits manufactured,  
11 fabricated, and/or assembled on behalf of any and all Defendants.”

12 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
13 confidential research, development, or commercial information, at least to the extent it seeks  
14 information about “any and all systems, devices, components, and/or integrated circuits  
15 manufactured, fabricated, and/or assembled on behalf of any and all Defendants using any  
16 Applied Materials APC and/or FDC hardware, software, systems, components, and/or modules,”  
17 and about “identification of any and all applicable technology node(s) for which each such  
18 system is/was used.” Any production of information by UMC Group (USA) in response to the  
19 Subpoena will made pursuant to the Protective Order governing the disclosure of confidential  
20 information in the underlying action. UMC Group (USA) reserves the right to insist upon  
21 supplemental protections.

22 Subject to and without waiving these specific objections and the foregoing General  
23 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
24 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
25 documents.  
26  
27  
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**REQUEST NO. 11:**

Documents relating to Your agreement or contract with any and all Defendants to fabricate, manufacture, and/or assemble those systems, devices, components, and/or integrated circuits described in Request for Production No. 10, including, without limitation, master service agreements, partnership agreements, development agreements, contract manufacturing agreements, manufacturing supply agreements, supplier agreements, distribution agreements, manufacturing contract service level agreements, and semiconductor purchase agreements.

**OBJECTIONS AND RESPONSE TO REQUEST NO. 11:**

UMC Group (USA) incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further objects to this Request to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC Group (USA) further objects to this Request to the extent it seeks information not in UMC Group (USA)'s possession, custody or control.

UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party's claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it seeks information about "any and all Defendants," and about "those systems, devices, components, and/or integrated circuits described in Request for Production No. 10."

UMC Group (USA) further objects to this Request as seeking information that that is available from one or more parties to the underlying action, and duplicative of other discovery already taken or requested in the underlying action, at least to the extent it seeks information about "Your agreement or contract with any and all Defendants."

1 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
 2 confidential research, development, or commercial information, at least to the extent it seeks  
 3 information about “Your agreement or contract with any and all Defendants to fabricate,  
 4 manufacture, and/or assemble those systems, devices, components, and/or integrated circuits  
 5 described in Request for Production No. 10,” and about “master service agreements, partnership  
 6 agreements, development agreements, contract manufacturing agreements, manufacturing supply  
 7 agreements, supplier agreements, distribution agreements, manufacturing contract service level  
 8 agreements, and semiconductor purchase agreements.” Any production of information by UMC  
 9 Group (USA) in response to the Subpoena will be made pursuant to the Protective Order governing  
 10 the disclosure of confidential information in the underlying action. UMC Group (USA) reserves  
 11 the right to insist upon supplemental protections.

12 Subject to and without waiving these specific objections and the foregoing General  
 13 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
 14 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
 15 documents that would not also be available from one or more parties to the underlying action,  
 16 and therefore UMC Group (USA) will not produce any documents in response to this topic.

17 **REQUEST NO. 12:**

18 Documents relating to any agreement between You and Applied Materials to be  
 19 indemnified by, or to indemnify, Applied Materials for patent infringement in connection with  
 20 Your use, utilization, installation, implementation, and/or deployment of any Applied Materials  
 21 APC and/or FDC hardware, software, systems, components, and/or modules as described in  
 22 Request for Production No. 7, including the E3 and/or Smart Factory system(s).

23 **OBJECTIONS AND RESPONSE TO REQUEST NO. 12:**

24 UMC Group (USA) incorporates each of its General Objections, Objections to  
 25 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
 26 objects to this Request to the extent it seeks information that is protected from discovery by the  
 27 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
 28

1 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
2 not in UMC Group (USA)'s possession, custody or control.

3 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
4 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
5 identification and specificity, requiring subjective judgment and speculation, seeking information  
6 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
7 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
8 Rules of Civil Procedure, at least to the extent it seeks information about "Applied Materials,"  
9 and about "any Applied Materials APC and/or FDC hardware, software, systems, components,  
10 and/or modules as described in Request for Production No. 7, including the E3 and/or Smart  
11 Factory system(s)."

12 UMC Group (USA) further objects to this Request as seeking information that is more  
13 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
14 extent it seeks information about "any agreement between You and Applied Materials," and  
15 about "any Applied Materials APC and/or FDC hardware, software, systems, components,  
16 and/or modules as described in Request for Production No. 7, including the E3 and/or Smart  
17 Factory system(s)."

18 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
19 confidential research, development, or commercial information, at least to the extent it seeks  
20 information about "any agreement between You and Applied Materials to be indemnified by, or  
21 to indemnify, Applied Materials for patent infringement," and about "Your use, utilization,  
22 installation, implementation, and/or deployment of any Applied Materials APC and/or FDC  
23 hardware, software, systems, components, and/or modules as described in Request for  
24 Production No. 7, including the E3 and/or Smart Factory system(s)." Any production of  
25 information by UMC Group (USA) in response to the Subpoena will be made pursuant to the  
26 Protective Order governing the disclosure of confidential information in the underlying action.  
27 UMC Group (USA) reserves the right to insist upon supplemental protections.  
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1 Subject to and without waiving these specific objections and the foregoing General  
 2 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
 3 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
 4 documents.

5 **REQUEST NO. 13:**

6 Documents relating to the design, development, operation, and/or implementation of any  
 7 APC and/or FDC hardware, software, systems, components, and/or modules by any entity other  
 8 than Applied Materials that are/were used, utilized, installed, implemented and/or deployed in  
 9 Your manufacturing, fabrication, and/or assembly tool, equipment, and/or facility in connection  
 10 with Your manufacturing, fabrication, and/or assembly of any Infringing Instrumentalities,  
 11 including any in-house and/or proprietary APC and/or FDC hardware, software, systems,  
 12 components, and/or modules designed, developed, operated, and/or implemented by You.

13 **OBJECTIONS AND RESPONSE TO REQUEST NO. 13:**

14 UMC Group (USA) incorporates each of its General Objections, Objections to  
 15 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
 16 objects to this Request to the extent it seeks information that is protected from discovery by the  
 17 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
 18 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
 19 not in UMC Group (USA)'s possession, custody or control.

20 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
 21 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
 22 identification and specificity, requiring subjective judgment and speculation, seeking information  
 23 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
 24 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
 25 Rules of Civil Procedure, at least to the extent it seeks information about "any APC and/or FDC  
 26 hardware, software, systems, components, and/or modules by any entity other than Applied  
 27 Materials," about "Your manufacturing, fabrication, and/or assembly tool, equipment, and/or  
 28



1 facility,” about “any Infringing Instrumentalities,” and about “any in-house and/or proprietary  
2 APC and/or FDC hardware, software, systems, components, and/or modules designed,  
3 developed, operated, and/or implemented by You.”

4 UMC Group (USA) further objects to this Request as seeking information that that is  
5 available from one or more parties to the underlying action, and duplicative of other discovery  
6 already taken or requested in the underlying action, at least to the extent it seeks information  
7 about “any Infringing Instrumentalities.”

8 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
9 confidential research, development, or commercial information, at least to the extent it seeks  
10 information about “the design, development, operation, and/or implementation of any APC  
11 and/or FDC hardware, software, systems, components, and/or modules that are/were used,  
12 utilized, installed, implemented and/or deployed in Your manufacturing, fabrication, and/or  
13 assembly tool, equipment, and/or facility,” about “Your manufacturing, fabrication, and/or  
14 assembly of any Infringing Instrumentalities,” and about “any in-house and/or proprietary APC  
15 and/or FDC hardware, software, systems, components, and/or modules designed, developed,  
16 operated, and/or implemented by You.” Any production of information by UMC Group (USA)  
17 in response to the Subpoena will made pursuant to the Protective Order governing the disclosure  
18 of confidential information in the underlying action. UMC Group (USA) reserves the right to  
19 insist upon supplemental protections.

20 Subject to and without waiving these specific objections and the foregoing General  
21 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
22 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
23 documents.

24 **REQUEST NO. 14:**

25 Documents sufficient to show the use, utilization, installation, implementation, and/or  
26 deployment of PDF Solutions’ process control and/or FDC hardware, software, systems,  
27 components, and/or modules, including without limitation, PDF Solutions’ Exensio platform and  
28

1 modules, in any of Your manufacture, fabrication, and/or assembly tool, equipment and/or  
 2 facility in connection with Your manufacture, fabrication, and/or assembly of any and all  
 3 Infringing Instrumentalities for any Defendant, including the identification of all versions and  
 4 models of any such system and the location of such use, utilization, installation, implementation,  
 5 and/or deployment including the location of any and all such manufacturing or fabrication  
 6 facilities.

7 **OBJECTIONS AND RESPONSE TO REQUEST NO. 14:**

8 UMC Group (USA) incorporates each of its General Objections, Objections to  
 9 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
 10 objects to this Request to the extent it seeks information that is protected from discovery by the  
 11 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
 12 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
 13 not in UMC Group (USA)'s possession, custody or control.

14 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
 15 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
 16 identification and specificity, requiring subjective judgment and speculation, seeking information  
 17 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
 18 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
 19 Rules of Civil Procedure, at least to the extent it seeks information about "PDF Solutions'  
 20 process control and/or FDC hardware, software, systems, components, and/or modules, including  
 21 without limitation, PDF Solutions' Exensio platform and modules," about "Your manufacture,  
 22 fabrication, and/or assembly tool, equipment and/or facility," about "any and all Infringing  
 23 Instrumentalities," and about "any Defendant."

24 UMC Group (USA) further objects to this Request as seeking information that is more  
 25 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
 26 extent it seeks information about "PDF Solutions' process control and/or FDC hardware,  
 27  
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1 software, systems, components, and/or modules, including without limitation, PDF Solutions’  
2 Exensio platform and modules.”

3 UMC Group (USA) further objects to this Request as seeking information that that is  
4 available from one or more parties to the underlying action, and duplicative of other discovery  
5 already taken or requested in the underlying action, at least to the extent it seeks information  
6 about “any and all Infringing Instrumentalities for any Defendant.”

7 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
8 confidential research, development, or commercial information, at least to the extent it seeks  
9 information about “use, utilization, installation, implementation, and/or deployment of PDF  
10 Solutions’ process control and/or FDC hardware, software, systems, components, and/or  
11 modules, including without limitation, PDF Solutions’ Exensio platform and modules, in any of  
12 Your manufacture, fabrication, and/or assembly tool, equipment and/or facility,” about “Your  
13 manufacture, fabrication, and/or assembly of any and all Infringing Instrumentalities for any  
14 Defendant,” and about “identification of all versions and models of any such system and the  
15 location of such use, utilization, installation, implementation, and/or deployment including the  
16 location of any and all such manufacturing or fabrication facilities.” Any production of  
17 information by UMC Group (USA) in response to the Subpoena will made pursuant to the  
18 Protective Order governing the disclosure of confidential information in the underlying action.  
19 UMC Group (USA) reserves the right to insist upon supplemental protections.

20 Subject to and without waiving these specific objections and the foregoing General  
21 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
22 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
23 documents.

24 **REQUEST NO. 15:**

25 Purchase or sales orders, invoices, purchase agreements, sales agreements, and/or  
26 supplier agreements relating to any PDF Solutions process control and/or FDC hardware,  
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1 software, systems, components, and/or modules, including the Exensio platform and modules, as  
 2 described in Request for Production No. 14 between You and PDF Solutions.

3 **OBJECTIONS AND RESPONSE TO REQUEST NO. 15:**

4 UMC Group (USA) incorporates each of its General Objections, Objections to  
 5 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
 6 objects to this Request to the extent it seeks information that is protected from discovery by the  
 7 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
 8 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
 9 not in UMC Group (USA)'s possession, custody or control.

10 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
 11 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
 12 identification and specificity, requiring subjective judgment and speculation, seeking information  
 13 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
 14 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
 15 Rules of Civil Procedure, at least to the extent it seeks information about "any PDF Solutions  
 16 process control and/or FDC hardware, software, systems, components, and/or modules, including  
 17 the Exensio platform and modules," and about "PDF Solutions."

18 UMC Group (USA) further objects to this Request as seeking information that is more  
 19 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
 20 extent it seeks information about "[p]urchase or sales orders, invoices, purchase agreements,  
 21 sales agreements, and/or supplier agreements ... between You and PDF Solutions."

22 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
 23 confidential research, development, or commercial information, at least to the extent it seeks  
 24 information about "[p]urchase or sales orders, invoices, purchase agreements, sales agreements,  
 25 and/or supplier agreements relating to any PDF Solutions process control and/or FDC hardware,  
 26 software, systems, components, and/or modules, including the Exensio platform and modules."  
 27 Any production of information by UMC Group (USA) in response to the Subpoena will made  
 28

1 pursuant to the Protective Order governing the disclosure of confidential information in the  
2 underlying action. UMC Group (USA) reserves the right to insist upon supplemental  
3 protections.

4 Subject to and without waiving these specific objections and the foregoing General  
5 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
6 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
7 documents.

8 **REQUEST NO. 16:**

9 Documents sufficient to show the identity and role played by any and all Defendants in  
10 the design, development, manufacture, testing, and/or importation of the Infringing  
11 Instrumentalities that are/were fabricated, manufactured, and/or assembled by You using any  
12 PDF Solutions process control and/or FDC hardware, software, systems, components, and/or  
13 modules, as described in Request for Production No. 14, including the Exensio platform and  
14 modules.

15 **OBJECTIONS AND RESPONSE TO REQUEST NO. 16:**

16 UMC Group (USA) incorporates each of its General Objections, Objections to  
17 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
18 objects to this Request to the extent it seeks information that is protected from discovery by the  
19 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
20 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
21 not in UMC Group (USA)'s possession, custody or control.

22 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
23 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
24 identification and specificity, requiring subjective judgment and speculation, seeking information  
25 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
26 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
27 Rules of Civil Procedure, at least to the extent it seeks information about "any and all  
28

1 Defendants,” about “Infringing Instrumentalities,” and about “any PDF Solutions process control  
2 and/or FDC hardware, software, systems, components, and/or modules.”

3 UMC Group (USA) further objects to this Request as seeking information that is more  
4 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
5 extent it seeks information about “any PDF Solutions process control and/or FDC hardware,  
6 software, systems, components, and/or modules.”

7 UMC Group (USA) further objects to this Request as seeking information that that is  
8 available from one or more parties to the underlying action, and duplicative of other discovery  
9 already taken or requested in the underlying action, at least to the extent it seeks information  
10 about “the identity and role played by any and all Defendants,” and about “Infringing  
11 Instrumentalities.”

12 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
13 confidential research, development, or commercial information, at least to the extent it seeks  
14 information about “the design, development, manufacture, testing, and/or importation of the  
15 Infringing Instrumentalities that are/were fabricated, manufactured, and/or assembled by You  
16 using any PDF Solutions process control and/or FDC hardware, software, systems, components,  
17 and/or modules.” Any production of information by UMC Group (USA) in response to the  
18 Subpoena will made pursuant to the Protective Order governing the disclosure of confidential  
19 information in the underlying action. UMC Group (USA) reserves the right to insist upon  
20 supplemental protections.

21 Subject to and without waiving these specific objections and the foregoing General  
22 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
23 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
24 documents.

25 **REQUEST NO. 17:**

26 Documents sufficient to identify any and all systems, devices, components, or integrated  
27 circuits manufactured, fabricated, and/or assembled on behalf of any and all Defendants using  
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1 any PDF Solutions process control and/or FDC hardware, software, systems, components, and/or  
2 modules, including the Exensio platform and modules, as described in Request for Production  
3 No. 14, including the identification of any and all applicable technology node(s) for which each  
4 such system is/was used.

5 **OBJECTIONS AND RESPONSE TO REQUEST NO. 17:**

6 UMC Group (USA) incorporates each of its General Objections, Objections to  
7 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
8 objects to this Request to the extent it seeks information that is protected from discovery by the  
9 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
10 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
11 not in UMC Group (USA)'s possession, custody or control.

12 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
13 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
14 identification and specificity, requiring subjective judgment and speculation, seeking information  
15 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
16 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
17 Rules of Civil Procedure, at least to the extent it seeks information about "any and all  
18 Defendants," and about "any PDF Solutions process control and/or FDC hardware, software,  
19 systems, components, and/or modules, including the Exensio platform and modules."

20 UMC Group (USA) further objects to this Request as seeking information that is more  
21 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
22 extent it seeks information about "any PDF Solutions process control and/or FDC hardware,  
23 software, systems, components, and/or modules, including the Exensio platform and modules."

24 UMC Group (USA) further objects to this Request as seeking information that that is  
25 available from one or more parties to the underlying action, and duplicative of other discovery  
26 already taken or requested in the underlying action, at least to the extent it seeks information  
27  
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1 about “any and all systems, devices, components, or integrated circuits manufactured, fabricated,  
2 and/or assembled on behalf of any and all Defendants.”

3 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
4 confidential research, development, or commercial information, at least to the extent it seeks  
5 information about “any and all systems, devices, components, or integrated circuits  
6 manufactured, fabricated, and/or assembled on behalf of any and all Defendants using any PDF  
7 Solutions process control and/or FDC hardware, software, systems, components, and/or modules,  
8 including the Exensio platform and modules,” and about “identification of any and all applicable  
9 technology node(s) for which each such system is/was used.” Any production of information by  
10 UMC Group (USA) in response to the Subpoena will be made pursuant to the Protective Order  
11 governing the disclosure of confidential information in the underlying action. UMC Group  
12 (USA) reserves the right to insist upon supplemental protections.

13 Subject to and without waiving these specific objections and the foregoing General  
14 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
15 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
16 documents.

17 **REQUEST NO. 18:**

18 Documents relating to Your agreement or contract with any and all Defendants to  
19 fabricate, manufacture, and/or assemble those systems, devices, components, and/or integrated  
20 circuits described in Request for Production No. 17, including, without limitation, master service  
21 agreements, partnership agreements, development agreements, contract manufacturing  
22 agreements, manufacturing supply agreements, supplier agreements, distribution agreements,  
23 manufacturing contract service level agreements, and semiconductor purchase agreements.

24 **OBJECTIONS AND RESPONSE TO REQUEST NO. 18:**

25 UMC Group (USA) incorporates each of its General Objections, Objections to  
26 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
27 objects to this Request to the extent it seeks information that is protected from discovery by the  
28



1 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
2 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
3 not in UMC Group (USA)'s possession, custody or control.

4 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
5 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
6 identification and specificity, requiring subjective judgment and speculation, seeking information  
7 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
8 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
9 Rules of Civil Procedure, at least to the extent it seeks information about "any and all  
10 Defendants," and about "those systems, devices, components, and/or integrated circuits  
11 described in Request for Production No. 17."

12 UMC Group (USA) further objects to this Request as seeking information that that is  
13 available from one or more parties to the underlying action, and duplicative of other discovery  
14 already taken or requested in the underlying action, at least to the extent it seeks information  
15 about "Your agreement or contract with any and all Defendants."

16 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
17 confidential research, development, or commercial information, at least to the extent it seeks  
18 information about "Your agreement or contract with any and all Defendants to fabricate,  
19 manufacture, and/or assemble those systems, devices, components, and/or integrated circuits  
20 described in Request for Production No. 17," and about "master service agreements, partnership  
21 agreements, development agreements, contract manufacturing agreements, manufacturing supply  
22 agreements, supplier agreements, distribution agreements, manufacturing contract service level  
23 agreements, and semiconductor purchase agreements." Any production of information by UMC  
24 Group (USA) in response to the Subpoena will made pursuant to the Protective Order governing  
25 the disclosure of confidential information in the underlying action. UMC Group (USA) reserves  
26 the right to insist upon supplemental protections.

1 Subject to and without waiving these specific objections and the foregoing General  
 2 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
 3 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
 4 documents that would not also be available from one or more parties to the underlying action,  
 5 and therefore UMC Group (USA) will not produce any documents in response to this topic.

6 **REQUEST NO. 19:**

7 Documents relating to any agreement between You and PDF Solutions to be indemnified  
 8 by, or to indemnify, PDF Solutions for patent infringement in connection with Your use,  
 9 utilization, installation, implementation, and/or deployment of any PDF Solutions process  
 10 control and/or FDC hardware, software, systems, components, and/or modules as described in  
 11 Request for Production No. 14, including the Exensio platform and modules.

12 **OBJECTIONS AND RESPONSE TO REQUEST NO. 19:**

13 UMC Group (USA) incorporates each of its General Objections, Objections to  
 14 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
 15 objects to this Request to the extent it seeks information that is protected from discovery by the  
 16 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
 17 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
 18 not in UMC Group (USA)'s possession, custody or control.

19 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
 20 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
 21 identification and specificity, requiring subjective judgment and speculation, seeking information  
 22 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
 23 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
 24 Rules of Civil Procedure, at least to the extent it seeks information about "PDF Solutions," and  
 25 about "any PDF Solutions process control and/or FDC hardware, software, systems, components,  
 26 and/or modules as described in Request for Production No. 14, including the Exensio platform  
 27 and modules."  
 28

1 UMC Group (USA) further objects to this Request as seeking information that is more  
 2 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
 3 extent it seeks information about “any agreement between You and PDF Solutions,” and about  
 4 “any PDF Solutions process control and/or FDC hardware, software, systems, components,  
 5 and/or modules as described in Request for Production No. 14, including the Exensio platform  
 6 and modules.”

7 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
 8 confidential research, development, or commercial information, at least to the extent it seeks  
 9 information about “any agreement between You and PDF Solutions to be indemnified by, or to  
 10 indemnify, PDF Solutions for patent infringement,” and about “Your use, utilization, installation,  
 11 implementation, and/or deployment of any PDF Solutions process control and/or FDC hardware,  
 12 software, systems, components, and/or modules as described in Request for Production No. 14,  
 13 including the Exensio platform and modules.” Any production of information by UMC Group  
 14 (USA) in response to the Subpoena will be made pursuant to the Protective Order governing the  
 15 disclosure of confidential information in the underlying action. UMC Group (USA) reserves the  
 16 right to insist upon supplemental protections.

17 Subject to and without waiving these specific objections and the foregoing General  
 18 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
 19 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
 20 documents.

21 **REQUEST NO. 20:**

22 Documents relating to any agreement between You and equipment suppliers, including  
 23 ASML, Applied Materials, and PDF Solutions, to indemnify, and/or be indemnified by, any of  
 24 the Defendants for patent infringement in relation with Your use, utilization, installation,  
 25 implementation, and/or deployment of:

- 26 1. ASML’s TWINSCAN and/or YieldStar system(s) as described in Request for  
 27 Production No. 1;  
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2. Applied Materials' APC and/or FDC hardware, software, systems, components, and/or modules, including the E3 and/or Smart Factory system(s), as described in Request for Production No. 7; and
3. PDF Solutions' process control and/or FDC hardware, software, systems, components, and/or modules, including the Exensio platform as described in Request for Production No. 14.

**OBJECTIONS AND RESPONSE TO REQUEST NO. 20:**

UMC Group (USA) incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further objects to this Request to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC Group (USA) further objects to this Request to the extent it seeks information not in UMC Group (USA)'s possession, custody or control.

UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party's claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it seeks information about "ASML," about "Applied Materials," about "PDF Solutions," about "any and all Defendants," about "ASML's TWINSKAN and/or YieldStar system(s) as described in Request for Production No. 1," about "Applied Materials' APC and/or FDC hardware, software, systems, components, and/or modules, including the E3 and/or Smart Factory system(s), as described in Request for Production No. 7," and about "PDF Solutions' process control and/or FDC hardware, software, systems, components, and/or modules, including the Exensio platform as described in Request for Production No. 14."

1 UMC Group (USA) further objects to this Request as seeking information that is more  
2 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
3 extent it seeks information about “any agreement between You and equipment suppliers,  
4 including ASML, Applied Materials, and PDF Solutions,” about “ASML’s TWINSCAN and/or  
5 YieldStar system(s) as described in Request for Production No. 1,” about “Applied Materials’  
6 APC and/or FDC hardware, software, systems, components, and/or modules, including the  
7 E3 and/or Smart Factory system(s), as described in Request for Production No. 7,” and  
8 about “PDF Solutions’ process control and/or FDC hardware, software, systems,  
9 components, and/or modules, including the Exensio platform as described in Request for  
10 Production No. 14.”

11 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
12 confidential research, development, or commercial information, at least to the extent it seeks  
13 information about “any agreement between You and equipment suppliers, including ASML,  
14 Applied Materials, and PDF Solutions, to indemnify, and/or be indemnified by, any of the  
15 Defendants for patent infringement,” about “Your use, utilization, installation, implementation,  
16 and/or deployment of ... ASML’s TWINSCAN and/or YieldStar system(s),” about “Your  
17 use, utilization, installation, implementation, and/or deployment of ... Applied Materials’ APC  
18 and/or FDC hardware, software, systems, components, and/or modules, including the E3  
19 and/or Smart Factory system(s),” and about “Your use, utilization, installation, implementation,  
20 and/or deployment of ... PDF Solutions’ process control and/or FDC hardware, software,  
21 systems, components, and/or modules, including the Exensio platform.” Any production of  
22 information by UMC Group (USA) in response to the Subpoena will be made pursuant to the  
23 Protective Order governing the disclosure of confidential information in the underlying action.  
24 UMC Group (USA) reserves the right to insist upon supplemental protections.

25 Subject to and without waiving these specific objections and the foregoing General  
26 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)

1 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
2 documents.

3 **REQUEST NO. 21:**

4 Documents sufficient to show the set-up, configuration, maintenance, and operation of  
5 the Manufacturing Equipment including describing how You set up, configure, maintain, and/or  
6 operate the Manufacturing Equipment involved in the manufacture, fabrication, and/or assembly  
7 of any and all Infringing Instrumentalities.

8 **OBJECTIONS AND RESPONSE TO REQUEST NO. 21:**

9 UMC Group (USA) incorporates each of its General Objections, Objections to  
10 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
11 objects to this Request to the extent it seeks information that is protected from discovery by the  
12 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
13 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
14 not in UMC Group (USA)'s possession, custody or control.

15 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
16 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
17 identification and specificity, requiring subjective judgment and speculation, seeking information  
18 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
19 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
20 Rules of Civil Procedure, at least to the extent it seeks information about "Manufacturing  
21 Equipment," and about "any and all Infringing Instrumentalities."

22 UMC Group (USA) further objects to this Request as seeking information that is more  
23 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
24 extent it seeks information about "Manufacturing Equipment."

25 UMC Group (USA) further objects to this Request as seeking information that that is  
26 available from one or more parties to the underlying action, and duplicative of other discovery  
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1 already taken or requested in the underlying action, at least to the extent it seeks information  
2 about “any and all Infringing Instrumentalities.”

3 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
4 confidential research, development, or commercial information, at least to the extent it seeks  
5 information about “the set-up, configuration, maintenance, and operation of the Manufacturing  
6 Equipment,” about “how You set up, configure, maintain, and/or operate the Manufacturing  
7 Equipment,” and about “the manufacture, fabrication, and/or assembly of any and all Infringing  
8 Instrumentalities.” Any production of information by UMC Group (USA) in response to the  
9 Subpoena will be made pursuant to the Protective Order governing the disclosure of confidential  
10 information in the underlying action. UMC Group (USA) reserves the right to insist upon  
11 supplemental protections.

12 Subject to and without waiving these specific objections and the foregoing General  
13 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
14 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
15 documents.

16 **REQUEST NO. 22:**

17 Documents relating to technical evaluation, testing, qualification, or inspection of any  
18 and all Manufacturing Equipment used, utilized, installed, implemented, and/or deployed in the  
19 manufacture, fabrication, or assembly of any and all Infringing Instrumentalities.

20 **OBJECTIONS AND RESPONSE TO REQUEST NO. 22:**

21 UMC Group (USA) incorporates each of its General Objections, Objections to  
22 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
23 objects to this Request to the extent it seeks information that is protected from discovery by the  
24 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
25 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
26 not in UMC Group (USA)’s possession, custody or control.  
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1 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
2 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
3 identification and specificity, requiring subjective judgment and speculation, seeking information  
4 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
5 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
6 Rules of Civil Procedure, at least to the extent it seeks information about "any and all  
7 Manufacturing Equipment," and about "any and all Infringing Instrumentalities."

8 UMC Group (USA) further objects to this Request as seeking information that is more  
9 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
10 extent it seeks information about "Manufacturing Equipment."

11 UMC Group (USA) further objects to this Request as seeking information that that is  
12 available from one or more parties to the underlying action, and duplicative of other discovery  
13 already taken or requested in the underlying action, at least to the extent it seeks information  
14 about "any and all Infringing Instrumentalities."

15 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
16 confidential research, development, or commercial information, at least to the extent it seeks  
17 information about "technical evaluation, testing, qualification, or inspection of any and all  
18 Manufacturing Equipment," and about "the manufacture, fabrication, or assembly of any and all  
19 Infringing Instrumentalities." Any production of information by UMC Group (USA) in response  
20 to the Subpoena will be made pursuant to the Protective Order governing the disclosure of  
21 confidential information in the underlying action. UMC Group (USA) reserves the right to insist  
22 upon supplemental protections.

23 Subject to and without waiving these specific objections and the foregoing General  
24 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
25 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
26 documents.



**REQUEST NO. 23:**

Documents relating to technical evaluation, testing, qualification, or inspection of any of the Infringing Instrumentalities manufactured, fabricated, or assembled by You in connection with Your use, utilization, installation, implementation, and/or deployment of the Manufacturing Equipment.

**OBJECTIONS AND RESPONSE TO REQUEST NO. 23:**

UMC Group (USA) incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further objects to this Request to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC Group (USA) further objects to this Request to the extent it seeks information not in UMC Group (USA)'s possession, custody or control.

UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party's claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it seeks information about "any of the Infringing Instrumentalities," and about "Manufacturing Equipment."

UMC Group (USA) further objects to this Request as seeking information that is more readily and/or appropriately available from, or confidential to, another non-party, at least to the extent it seeks information about "Manufacturing Equipment."

UMC Group (USA) further objects to this Request as seeking information that that is available from one or more parties to the underlying action, and duplicative of other discovery already taken or requested in the underlying action, at least to the extent it seeks information about "any of the Infringing Instrumentalities."

1 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
 2 confidential research, development, or commercial information, at least to the extent it seeks  
 3 information about “technical evaluation, testing, qualification, or inspection of any of the  
 4 Infringing Instrumentalities manufactured, fabricated, or assembled by You,” and about “Your  
 5 use, utilization, installation, implementation, and/or deployment of the Manufacturing  
 6 Equipment.” Any production of information by UMC Group (USA) in response to the Subpoena  
 7 will made pursuant to the Protective Order governing the disclosure of confidential information  
 8 in the underlying action. UMC Group (USA) reserves the right to insist upon supplemental  
 9 protections.

10 Subject to and without waiving these specific objections and the foregoing General  
 11 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
 12 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
 13 documents.

14 **REQUEST NO. 24:**

15 Documents sufficient to show technical, hardware, or software support requested by You  
 16 and sent to any of the Equipment Manufacturers in connection with Your use, utilization,  
 17 installation, implementation, and/or deployment of any and all Manufacturing Equipment.

18 **OBJECTIONS AND RESPONSE TO REQUEST NO. 24:**

19 UMC Group (USA) incorporates each of its General Objections, Objections to  
 20 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
 21 objects to this Request to the extent it seeks information that is protected from discovery by the  
 22 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
 23 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
 24 not in UMC Group (USA)’s possession, custody or control.

25 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
 26 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
 27 identification and specificity, requiring subjective judgment and speculation, seeking information  
 28

1 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
 2 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
 3 Rules of Civil Procedure, at least to the extent it seeks information about "any of the Equipment  
 4 Manufacturers," and about "any and all Manufacturing Equipment."

5 UMC Group (USA) further objects to this Request as seeking information that is more  
 6 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
 7 extent it seeks information about "technical, hardware, or software support requested by You and  
 8 sent to any of the Equipment Manufacturers," and about "Manufacturing Equipment."

9 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
 10 confidential research, development, or commercial information, at least to the extent it seeks  
 11 information about "technical, hardware, or software support requested by You and sent to any of  
 12 the Equipment Manufacturers," and about "Your use, utilization, installation, implementation,  
 13 and/or deployment of any and all Manufacturing Equipment." Any production of information by  
 14 UMC Group (USA) in response to the Subpoena will be made pursuant to the Protective Order  
 15 governing the disclosure of confidential information in the underlying action. UMC Group  
 16 (USA) reserves the right to insist upon supplemental protections.

17 Subject to and without waiving these specific objections and the foregoing General  
 18 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
 19 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
 20 documents.

21 **REQUEST NO. 25:**

22 Documents sufficient to show the sales volume, revenues, costs of goods sold, gross  
 23 profits, operating costs, operating profits, and/or net profits directly or indirectly related to the  
 24 manufacture, fabrication, and/or assembly of systems, devices, components, or integrated  
 25 circuits, including the Infringing Instrumentalities, that are/were manufactured, fabricated, and/or  
 26 assembly on behalf of any and all Defendants in connection with Your use, utilization,  
 27  
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1 installation, implementation, and/or deployment of the Manufacturing Equipment from 2014 to  
2 the present.

3 **OBJECTIONS AND RESPONSE TO REQUEST NO. 25:**

4 UMC Group (USA) incorporates each of its General Objections, Objections to  
5 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
6 objects to this Request to the extent it seeks information that is protected from discovery by the  
7 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
8 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
9 not in UMC Group (USA)'s possession, custody or control.

10 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
11 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
12 identification and specificity, requiring subjective judgment and speculation, seeking information  
13 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
14 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
15 Rules of Civil Procedure, at least to the extent it seeks information about "systems, devices,  
16 components, or integrated circuits, including the Infringing Instrumentalities," about "any and all  
17 Defendants," and about "Manufacturing Equipment."

18 UMC Group (USA) further objects to this Request as seeking information that is more  
19 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
20 extent it seeks information about "Manufacturing Equipment."

21 UMC Group (USA) further objects to this Request as seeking information that that is  
22 available from one or more parties to the underlying action, and duplicative of other discovery  
23 already taken or requested in the underlying action, at least to the extent it seeks information  
24 about "systems, devices, components, or integrated circuits, including the Infringing  
25 Instrumentalities, that are/were manufactured, fabricated, and/or assembly on behalf of any and  
26 all Defendants."  
27  
28

1 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
 2 confidential research, development, or commercial information, at least to the extent it seeks  
 3 information about “sales volume, revenues, costs of goods sold, gross profits, operating costs,  
 4 operating profits, and/or net profits,” about “the manufacture, fabrication, and/or assembly of  
 5 systems, devices, components, or integrated circuits, including the Infringing Instrumentalities,”  
 6 and about “Your use, utilization, installation, implementation, and/or deployment of the  
 7 Manufacturing Equipment.” Any production of information by UMC Group (USA) in response  
 8 to the Subpoena will be made pursuant to the Protective Order governing the disclosure of  
 9 confidential information in the underlying action. UMC Group (USA) reserves the right to insist  
 10 upon supplemental protections.

11 Subject to and without waiving these specific objections and the foregoing General  
 12 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
 13 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
 14 documents.

15 **REQUEST NO. 26:**

16 Documents sufficient to show any manufacturing equipment, tool, and/or platform used,  
 17 utilized, installed, implemented, and/or deployed in any of Your manufacturing and/or  
 18 fabrication facilities that includes an adjustable wafer stage.

19 **OBJECTIONS AND RESPONSE TO REQUEST NO. 26:**

20 UMC Group (USA) incorporates each of its General Objections, Objections to  
 21 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
 22 objects to this Request to the extent it seeks information that is protected from discovery by the  
 23 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
 24 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
 25 not in UMC Group (USA)’s possession, custody or control.

26 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
 27 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
 28

1 identification and specificity, requiring subjective judgment and speculation, seeking information  
2 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
3 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
4 Rules of Civil Procedure, at least to the extent it seeks information about "any manufacturing  
5 equipment, tool, and/or platform," and about "any of Your manufacturing and/or fabrication  
6 facilities that includes an adjustable wafer stage."

7 UMC Group (USA) further objects to this Request as seeking information that is more  
8 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
9 extent it seeks information about "any manufacturing equipment, tool, and/or platform ... that  
10 includes an adjustable wafer stage."

11 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
12 confidential research, development, or commercial information, at least to the extent it seeks  
13 information about "any manufacturing equipment, tool, and/or platform used, utilized, installed,  
14 implemented, and/or deployed in any of Your manufacturing and/or fabrication facilities that  
15 includes an adjustable wafer stage." Any production of information by UMC Group (USA) in  
16 response to the Subpoena will be made pursuant to the Protective Order governing the disclosure of  
17 confidential information in the underlying action. UMC Group (USA) reserves the right to insist  
18 upon supplemental protections.

19 Subject to and without waiving these specific objections and the foregoing General  
20 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
21 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
22 documents.

23 **REQUEST NO. 27:**

24 Documents relating to identifying, detecting and/or determining whether a  
25 manufacturing-related fault exists in Your manufacturing and/or fabrication tool and/or  
26 equipment used for Your manufacture, fabrication, and/or assembly of any and all Infringing  
27 Instrumentalities.

**OBJECTIONS AND RESPONSE TO REQUEST NO. 27:**

UMC Group (USA) incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further objects to this Request to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC Group (USA) further objects to this Request to the extent it seeks information not in UMC Group (USA)'s possession, custody or control.

UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party's claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it seeks information about "Your manufacturing and/or fabrication tool and/or equipment," and about "any and all Infringing Instrumentalities."

UMC Group (USA) further objects to this Request as seeking information that is more readily and/or appropriately available from, or confidential to, another non-party, at least to the extent it seeks information about "Your manufacturing and/or fabrication tool and/or equipment."

UMC Group (USA) further objects to this Request as seeking information that that is available from one or more parties to the underlying action, and duplicative of other discovery already taken or requested in the underlying action, at least to the extent it seeks information about "any and all Infringing Instrumentalities."

UMC Group (USA) further objects to this Request as seeking trade secret and/or other confidential research, development, or commercial information, at least to the extent it seeks information about "identifying, detecting and/or determining whether a manufacturing-related fault exists in Your manufacturing and/or fabrication tool and/or equipment," and about "Your manufacture, fabrication, and/or assembly of any and all Infringing Instrumentalities." Any

1 production of information by UMC Group (USA) in response to the Subpoena will made  
2 pursuant to the Protective Order governing the disclosure of confidential information in the  
3 underlying action. UMC Group (USA) reserves the right to insist upon supplemental  
4 protections.

5 Subject to and without waiving these specific objections and the foregoing General  
6 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
7 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
8 documents.

9 **REQUEST NO. 28:**

10 Documents sufficient to show any remedial actions taken by You upon identifying,  
11 detecting, and/or determining manufacturing-related faults exist in Your manufacturing and/or  
12 fabrication tool and/or equipment used for Your manufacture, fabrication, and/or assembly of  
13 any and all Infringing Instrumentalities.

14 **OBJECTIONS AND RESPONSE TO REQUEST NO. 28:**

15 UMC Group (USA) incorporates each of its General Objections, Objections to  
16 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
17 objects to this Request to the extent it seeks information that is protected from discovery by the  
18 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
19 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
20 not in UMC Group (USA)'s possession, custody or control.

21 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
22 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
23 identification and specificity, requiring subjective judgment and speculation, seeking information  
24 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
25 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
26 Rules of Civil Procedure, at least to the extent it seeks information about "Your manufacturing  
27 and/or fabrication tool and/or equipment," and about "any and all Infringing Instrumentalities."  
28



1 UMC Group (USA) further objects to this Request as seeking information that is more  
2 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
3 extent it seeks information about “Your manufacturing and/or fabrication tool and/or  
4 equipment.”

5 UMC Group (USA) further objects to this Request as seeking information that that is  
6 available from one or more parties to the underlying action, and duplicative of other discovery  
7 already taken or requested in the underlying action, at least to the extent it seeks information  
8 about “any and all Infringing Instrumentalities.”

9 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
10 confidential research, development, or commercial information, at least to the extent it seeks  
11 information about “any remedial actions taken by You upon identifying, detecting, and/or  
12 determining manufacturing-related faults exist,” about “Your manufacturing and/or fabrication  
13 tool and/or equipment,” and about “Your manufacture, fabrication, and/or assembly of any and  
14 all Infringing Instrumentalities.” Any production of information by UMC Group (USA) in  
15 response to the Subpoena will be made pursuant to the Protective Order governing the disclosure of  
16 confidential information in the underlying action. UMC Group (USA) reserves the right to insist  
17 upon supplemental protections.

18 Subject to and without waiving these specific objections and the foregoing General  
19 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
20 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
21 documents.

22 **REQUEST NO. 29:**

23 Documents relating to the translation of communications or data connection protocols  
24 (e.g., SECS (SEMI equipment communication standard), TCP/IP, OPC (OLE for Process  
25 Control), TIBCO, and ODP (optical data profiling)) between Your manufacturing and/or  
26 fabrication tool and/or equipment and Your FDC system, platform, and/or framework.

1 **OBJECTIONS AND RESPONSE TO REQUEST NO. 29:**

2 UMC Group (USA) incorporates each of its General Objections, Objections to  
3 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
4 objects to this Request to the extent it seeks information that is protected from discovery by the  
5 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
6 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
7 not in UMC Group (USA)'s possession, custody or control.

8 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
9 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
10 identification and specificity, requiring subjective judgment and speculation, seeking information  
11 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
12 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
13 Rules of Civil Procedure, at least to the extent it seeks information about "Your manufacturing  
14 and/or fabrication tool and/or equipment," and about "Your FDC system, platform, and/or  
15 framework."

16 UMC Group (USA) further objects to this Request as seeking information that is more  
17 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
18 extent it seeks information about "Your manufacturing and/or fabrication tool and/or  
19 equipment," and about "Your FDC system, platform, and/or framework."

20 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
21 confidential research, development, or commercial information, at least to the extent it seeks  
22 information about "translation of communications or data connection protocols," about "Your  
23 FDC system, platform, and/or framework," and about "Your FDC system, platform, and/or  
24 framework." Any production of information by UMC Group (USA) in response to the Subpoena  
25 will made pursuant to the Protective Order governing the disclosure of confidential information  
26 in the underlying action. UMC Group (USA) reserves the right to insist upon supplemental  
27 protections.  
28

1 Subject to and without waiving these specific objections and the foregoing General  
2 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
3 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
4 documents.

5 **REQUEST NO. 30:**

6 Documents sufficient to show the scheduling of factory events, preventive maintenance  
7 (“PMs”), manufacturing tasks and/or qualification tests (“Quals”) in connection with Your  
8 manufacturing and/or fabrication tool and/or equipment used for Your manufacture, fabrication,  
9 and/or assembly of any and all Infringing Instrumentalities, including, without limitation,  
10 scheduling of processing for lots and/or wafers, manufacturing and/or fabrication tool and/or  
11 equipment, PMs and Quals, and/or manufacturing resources in connection with Your  
12 manufacture, fabrication and/or assembly of the Infringing Instrumentalities.

13 **OBJECTIONS AND RESPONSE TO REQUEST NO. 30:**

14 UMC Group (USA) incorporates each of its General Objections, Objections to  
15 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
16 objects to this Request to the extent it seeks information that is protected from discovery by the  
17 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
18 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
19 not in UMC Group (USA)’s possession, custody or control.

20 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
21 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
22 identification and specificity, requiring subjective judgment and speculation, seeking information  
23 that is not relevant to any party’s claim or defense and proportional to the needs of the case, and  
24 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
25 Rules of Civil Procedure, at least to the extent it seeks information about “Your manufacturing  
26 and/or fabrication tool and/or equipment,” and about “any and all Infringing Instrumentalities.”  
27  
28

1 UMC Group (USA) further objects to this Request as seeking information that is more  
 2 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
 3 extent it seeks information about “Your manufacturing and/or fabrication tool and/or  
 4 equipment.”

5 UMC Group (USA) further objects to this Request as seeking information that that is  
 6 available from one or more parties to the underlying action, and duplicative of other discovery  
 7 already taken or requested in the underlying action, at least to the extent it seeks information  
 8 about “any and all Infringing Instrumentalities.”

9 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
 10 confidential research, development, or commercial information, at least to the extent it seeks  
 11 information about “the scheduling of factory events, preventive maintenance (“PMs”),  
 12 manufacturing tasks and/or qualification tests (“Quals”),” about “Your manufacturing and/or  
 13 fabrication tool and/or equipment,” about “Your manufacture, fabrication, and/or assembly of  
 14 any and all Infringing Instrumentalities,” and about “scheduling of processing for lots and/or  
 15 wafers, manufacturing and/or fabrication tool and/or equipment, PMs and Quals, and/or  
 16 manufacturing resources.” Any production of information by UMC Group (USA) in response to  
 17 the Subpoena will made pursuant to the Protective Order governing the disclosure of confidential  
 18 information in the underlying action. UMC Group (USA) reserves the right to insist upon  
 19 supplemental protections.

20 Subject to and without waiving these specific objections and the foregoing General  
 21 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
 22 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
 23 documents.

24 **REQUEST NO. 31:**

25 Documents sufficient to show Your manufacturing execution system (“MES”) used,  
 26 utilized, installed, implemented, and/or deployed at any of Your manufacturing and/or  
 27 fabrication facilities in connection with Your manufacturing and/or fabrication tool and/or  
 28

1 equipment used for Your manufacture, fabrication, and/or assembly of any and all Infringing  
2 Instrumentalities.

3 **OBJECTIONS AND RESPONSE TO REQUEST NO. 31:**

4 UMC Group (USA) incorporates each of its General Objections, Objections to  
5 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
6 objects to this Request to the extent it seeks information that is protected from discovery by the  
7 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
8 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
9 not in UMC Group (USA)'s possession, custody or control.

10 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
11 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
12 identification and specificity, requiring subjective judgment and speculation, seeking information  
13 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
14 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
15 Rules of Civil Procedure, at least to the extent it seeks information about "Your manufacturing  
16 execution system ("MES")," about "Your manufacturing and/or fabrication facilities," about  
17 "Your manufacturing and/or fabrication tool and/or equipment," and about "any and all  
18 Infringing Instrumentalities."

19 UMC Group (USA) further objects to this Request as seeking information that is more  
20 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
21 extent it seeks information about "Your manufacturing execution system ("MES")," and about  
22 "Your manufacturing and/or fabrication tool and/or equipment."

23 UMC Group (USA) further objects to this Request as seeking information that that is  
24 available from one or more parties to the underlying action, and duplicative of other discovery  
25 already taken or requested in the underlying action, at least to the extent it seeks information  
26 about "any and all Infringing Instrumentalities."

1 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
 2 confidential research, development, or commercial information, at least to the extent it seeks  
 3 information about “Your manufacturing execution system (“MES”),” about “Your  
 4 manufacturing and/or fabrication facilities,” about “Your manufacturing and/or fabrication tool  
 5 and/or equipment,” and about “Your manufacture, fabrication, and/or assembly of any and all  
 6 Infringing Instrumentalities.” Any production of information by UMC Group (USA) in response  
 7 to the Subpoena will be made pursuant to the Protective Order governing the disclosure of  
 8 confidential information in the underlying action. UMC Group (USA) reserves the right to insist  
 9 upon supplemental protections.

10 Subject to and without waiving these specific objections and the foregoing General  
 11 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
 12 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
 13 documents.

14 **REQUEST NO. 32:**

15 Documents sufficient to show manufacturing-related actions taken by You in response to  
 16 any of Your manufacturing and/or fabrication tool and/or equipment used for Your manufacture,  
 17 fabrication, and/or assembly of any and all Infringing Instrumentalities being malfunctioned,  
 18 inoperable, and/or defective during such manufacture, fabrication, and/or assembly.

19 **OBJECTIONS AND RESPONSE TO REQUEST NO. 32:**

20 UMC Group (USA) incorporates each of its General Objections, Objections to  
 21 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
 22 objects to this Request to the extent it seeks information that is protected from discovery by the  
 23 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
 24 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
 25 not in UMC Group (USA)’s possession, custody or control.

26 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
 27 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
 28

1 identification and specificity, requiring subjective judgment and speculation, seeking information  
2 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
3 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
4 Rules of Civil Procedure, at least to the extent it seeks information about "Your manufacturing  
5 and/or fabrication tool and/or equipment," and about "any and all Infringing Instrumentalities."

6 UMC Group (USA) further objects to this Request as seeking information that is more  
7 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
8 extent it seeks information about "Your manufacturing and/or fabrication tool and/or  
9 equipment."

10 UMC Group (USA) further objects to this Request as seeking information that that is  
11 available from one or more parties to the underlying action, and duplicative of other discovery  
12 already taken or requested in the underlying action, at least to the extent it seeks information  
13 about "any and all Infringing Instrumentalities."

14 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
15 confidential research, development, or commercial information, at least to the extent it seeks  
16 information about "manufacturing-related actions taken by You," about "Your manufacturing  
17 and/or fabrication tool and/or equipment," and about "Your manufacture, fabrication, and/or  
18 assembly of any and all Infringing Instrumentalities." Any production of information by UMC  
19 Group (USA) in response to the Subpoena will be made pursuant to the Protective Order governing  
20 the disclosure of confidential information in the underlying action. UMC Group (USA) reserves  
21 the right to insist upon supplemental protections.

22 Subject to and without waiving these specific objections and the foregoing General  
23 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
24 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
25 documents.  
26  
27  
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**REQUEST NO. 33:**

Documents sufficient to show Your measurement of critical dimension (“CD”) and/or overlay in connection with any and all semiconductor wafers used for Your manufacture, fabrication, and/or assembly of any and all Infringing Instrumentalities.

**OBJECTIONS AND RESPONSE TO REQUEST NO. 33:**

UMC Group (USA) incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further objects to this Request to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC Group (USA) further objects to this Request to the extent it seeks information not in UMC Group (USA)’s possession, custody or control.

UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party’s claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it seeks information about “Your measurement of critical dimension (“CD”) and/or overlay,” about “any and all semiconductor wafers,” and about “any and all Infringing Instrumentalities.”

UMC Group (USA) further objects to this Request as seeking information that is more readily and/or appropriately available from, or confidential to, another non-party, at least to the extent it seeks information about “Your measurement of critical dimension (“CD”) and/or overlay.”

UMC Group (USA) further objects to this Request as seeking information that that is available from one or more parties to the underlying action, and duplicative of other discovery already taken or requested in the underlying action, at least to the extent it seeks information about “any and all Infringing Instrumentalities.”



1 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
 2 confidential research, development, or commercial information, at least to the extent it seeks  
 3 information about “Your measurement of critical dimension (“CD”) and/or overlay,” and about  
 4 “Your manufacture, fabrication, and/or assembly of any and all Infringing Instrumentalities.”  
 5 Any production of information by UMC Group (USA) in response to the Subpoena will made  
 6 pursuant to the Protective Order governing the disclosure of confidential information in the  
 7 underlying action. UMC Group (USA) reserves the right to insist upon supplemental  
 8 protections.

9 Subject to and without waiving these specific objections and the foregoing General  
 10 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
 11 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
 12 documents.

13 **REQUEST NO. 34:**

14 Documents sufficient to show the use, implementation, or deployment of any grating or  
 15 grating structure in connection with any and all semiconductor wafers used for Your  
 16 manufacture, fabrication, and/or assembly of any and all Infringing Instrumentalities during  
 17 Your measurement of CD and/or overlay as described in Request for Production No. 33.

18 **OBJECTIONS AND RESPONSE TO REQUEST NO. 34:**

19 UMC Group (USA) incorporates each of its General Objections, Objections to  
 20 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
 21 objects to this Request to the extent it seeks information that is protected from discovery by the  
 22 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
 23 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
 24 not in UMC Group (USA)’s possession, custody or control.

25 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
 26 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
 27 identification and specificity, requiring subjective judgment and speculation, seeking information  
 28

1 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
2 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
3 Rules of Civil Procedure, at least to the extent it seeks information about "any grating or grating  
4 structure," about "any and all semiconductor wafers," about "any and all Infringing  
5 Instrumentalities," and about "Your measurement of CD and/or overlay."

6 UMC Group (USA) further objects to this Request as seeking information that is more  
7 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
8 extent it seeks information about "the use, implementation, or deployment of any grating or  
9 grating structure," and about "Your measurement of CD and/or overlay."

10 UMC Group (USA) further objects to this Request as seeking information that that is  
11 available from one or more parties to the underlying action, and duplicative of other discovery  
12 already taken or requested in the underlying action, at least to the extent it seeks information  
13 about "any and all Infringing Instrumentalities."

14 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
15 confidential research, development, or commercial information, at least to the extent it seeks  
16 information about "the use, implementation, or deployment of any grating or grating structure,"  
17 about "Your manufacture, fabrication, and/or assembly of any and all Infringing  
18 Instrumentalities," and about "Your measurement of CD and/or overlay." Any production of  
19 information by UMC Group (USA) in response to the Subpoena will made pursuant to the  
20 Protective Order governing the disclosure of confidential information in the underlying action.  
21 UMC Group (USA) reserves the right to insist upon supplemental protections.

22 Subject to and without waiving these specific objections and the foregoing General  
23 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
24 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
25 documents.  
26  
27  
28

**REQUEST NO. 35:**

Documents sufficient to show any efforts made by You to mitigate overlay errors and/or bring CDs within acceptable tolerance in connection with any and all semiconductor wafers used for Your manufacture, fabrication, and/or assembly of any and all Infringing Instrumentalities.

**OBJECTIONS AND RESPONSE TO REQUEST NO. 35:**

UMC Group (USA) incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further objects to this Request to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC Group (USA) further objects to this Request to the extent it seeks information not in UMC Group (USA)'s possession, custody or control.

UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party's claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it seeks information about "any efforts made by You," about "any and all semiconductor wafers," and about "any and all Infringing Instrumentalities."

UMC Group (USA) further objects to this Request as seeking information that is more readily and/or appropriately available from, or confidential to, another non-party, at least to the extent it seeks information about "any efforts made by You mitigate overlay errors and/or bring CDs within acceptable tolerance."

UMC Group (USA) further objects to this Request as seeking information that that is available from one or more parties to the underlying action, and duplicative of other discovery already taken or requested in the underlying action, at least to the extent it seeks information about "any and all Infringing Instrumentalities."

1 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
 2 confidential research, development, or commercial information, at least to the extent it seeks  
 3 information about “efforts made by You to mitigate overlay errors and/or bring CDs within  
 4 acceptable tolerance,” and about “Your manufacture, fabrication, and/or assembly of any and all  
 5 Infringing Instrumentalities.” Any production of information by UMC Group (USA) in response  
 6 to the Subpoena will be made pursuant to the Protective Order governing the disclosure of  
 7 confidential information in the underlying action. UMC Group (USA) reserves the right to insist  
 8 upon supplemental protections.

9 Subject to and without waiving these specific objections and the foregoing General  
 10 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
 11 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
 12 documents.

13 **REQUEST NO. 36:**

14 Documents relating to Your collection of metrology data used in connection with Your  
 15 manufacture, fabrication, and/or assembly of any and all Infringing Instrumentalities, including  
 16 processing of such data such as, without limitation, data filtering.

17 **OBJECTIONS AND RESPONSE TO REQUEST NO. 36:**

18 UMC Group (USA) incorporates each of its General Objections, Objections to  
 19 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
 20 objects to this Request to the extent it seeks information that is protected from discovery by the  
 21 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
 22 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
 23 not in UMC Group (USA)’s possession, custody or control.

24 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
 25 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
 26 identification and specificity, requiring subjective judgment and speculation, seeking information  
 27 that is not relevant to any party’s claim or defense and proportional to the needs of the case, and  
 28

1 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
2 Rules of Civil Procedure, at least to the extent it seeks information about “Your collection of  
3 metrology data,” and about “any and all Infringing Instrumentalities.”

4 UMC Group (USA) further objects to this Request as seeking information that is more  
5 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
6 extent it seeks information about “Your collection of metrology data,” and about “processing of  
7 such data such as, without limitation, data filtering.”

8 UMC Group (USA) further objects to this Request as seeking information that that is  
9 available from one or more parties to the underlying action, and duplicative of other discovery  
10 already taken or requested in the underlying action, at least to the extent it seeks information  
11 about “any and all Infringing Instrumentalities.”

12 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
13 confidential research, development, or commercial information, at least to the extent it seeks  
14 information about “Your collection of metrology data,” about “Your manufacture, fabrication,  
15 and/or assembly of any and all Infringing Instrumentalities,” and about “processing of such data  
16 such as, without limitation, data filtering.” Any production of information by UMC Group  
17 (USA) in response to the Subpoena will made pursuant to the Protective Order governing the  
18 disclosure of confidential information in the underlying action. UMC Group (USA) reserves the  
19 right to insist upon supplemental protections.

20 Subject to and without waiving these specific objections and the foregoing General  
21 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
22 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
23 documents.

24 **REQUEST NO. 37:**

25 Documents sufficient to show how Your collection of metrology data as described in  
26 Request for Production No. 36 is used in connection with Your manufacture, fabrication, and/or  
27 assembly of any and all Infringing Instrumentalities, including monitoring semiconductor wafers,  
28

1 modifying operating recipes, and/or controlling Your manufacturing and/or fabrication tool  
2 and/or equipment used for Your manufacture, fabrication, and/or assembly of any and all  
3 Infringing Instrumentalities.

4 **OBJECTIONS AND RESPONSE TO REQUEST NO. 37:**

5 UMC Group (USA) incorporates each of its General Objections, Objections to  
6 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
7 objects to this Request to the extent it seeks information that is protected from discovery by the  
8 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
9 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
10 not in UMC Group (USA)'s possession, custody or control.

11 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
12 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
13 identification and specificity, requiring subjective judgment and speculation, seeking information  
14 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
15 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
16 Rules of Civil Procedure, at least to the extent it seeks information about "Your collection of  
17 metrology data," about "any and all Infringing Instrumentalities," and about "Your  
18 manufacturing and/or fabrication tool and/or equipment."

19 UMC Group (USA) further objects to this Request as seeking information that is more  
20 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
21 extent it seeks information about "Your collection of metrology data," about "monitoring  
22 semiconductor wafers, modifying operating recipes, and/or controlling Your manufacturing  
23 and/or fabrication tool and/or equipment."

24 UMC Group (USA) further objects to this Request as seeking information that that is  
25 available from one or more parties to the underlying action, and duplicative of other discovery  
26 already taken or requested in the underlying action, at least to the extent it seeks information  
27 about "any and all Infringing Instrumentalities."

1 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
 2 confidential research, development, or commercial information, at least to the extent it seeks  
 3 information about “Your collection of metrology data,” about “Your manufacture, fabrication,  
 4 and/or assembly of any and all Infringing Instrumentalities,” about “monitoring semiconductor  
 5 wafers, modifying operating recipes, and/or controlling Your manufacturing and/or fabrication  
 6 tool and/or equipment,” and about “Your manufacture, fabrication, and/or assembly of any and  
 7 all Infringing Instrumentalities.” Any production of information by UMC Group (USA) in  
 8 response to the Subpoena will be made pursuant to the Protective Order governing the disclosure of  
 9 confidential information in the underlying action. UMC Group (USA) reserves the right to insist  
 10 upon supplemental protections.

11 Subject to and without waiving these specific objections and the foregoing General  
 12 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
 13 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
 14 documents.

15 **REQUEST NO. 38:**

16 Documents sufficient to show how You determine whether a manufacturing-related fault  
 17 identified, detected, and/or determined to exist in Your manufacturing and/or fabrication tool  
 18 and/or equipment used for Your manufacture, fabrication, and/or assembly of any and all  
 19 Infringing Instrumentalities is a false positive or false negative.

20 **OBJECTIONS AND RESPONSE TO REQUEST NO. 38:**

21 UMC Group (USA) incorporates each of its General Objections, Objections to  
 22 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
 23 objects to this Request to the extent it seeks information that is protected from discovery by the  
 24 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
 25 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
 26 not in UMC Group (USA)’s possession, custody or control.  
 27  
 28



1 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
2 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
3 identification and specificity, requiring subjective judgment and speculation, seeking information  
4 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
5 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
6 Rules of Civil Procedure, at least to the extent it seeks information about "Your manufacturing  
7 and/or fabrication tool and/or equipment," and about "any and all Infringing Instrumentalities."

8 UMC Group (USA) further objects to this Request as seeking information that is more  
9 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
10 extent it seeks information about "how You determine whether a manufacturing-related fault  
11 identified, detected, and/or determined to exist in Your manufacturing and/or fabrication tool  
12 and/or equipment ... is a false positive or false negative."

13 UMC Group (USA) further objects to this Request as seeking information that that is  
14 available from one or more parties to the underlying action, and duplicative of other discovery  
15 already taken or requested in the underlying action, at least to the extent it seeks information  
16 about "any and all Infringing Instrumentalities."

17 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
18 confidential research, development, or commercial information, at least to the extent it seeks  
19 information about "how You determine whether a manufacturing-related fault identified,  
20 detected, and/or determined to exist in Your manufacturing and/or fabrication tool and/or  
21 equipment ... is a false positive or false negative," and about "Your manufacture, fabrication,  
22 and/or assembly of any and all Infringing Instrumentalities." Any production of information by  
23 UMC Group (USA) in response to the Subpoena will be made pursuant to the Protective Order  
24 governing the disclosure of confidential information in the underlying action. UMC Group  
25 (USA) reserves the right to insist upon supplemental protections.

26 Subject to and without waiving these specific objections and the foregoing General  
27 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
28



1 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
2 documents.

3 **REQUEST NO. 39:**

4 Documents sufficient to show how You determine whether a manufacturing-related fault  
5 identified, detected, and/or determined to exist in Your manufacturing and/or fabrication tool  
6 and/or equipment used for Your manufacture, fabrication, and/or assembly of any and all  
7 Infringing Instrumentalities is one that requires You to remediate, rectify, cure, or correct such a  
8 fault.

9 **OBJECTIONS AND RESPONSE TO REQUEST NO. 39:**

10 UMC Group (USA) incorporates each of its General Objections, Objections to  
11 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
12 objects to this Request to the extent it seeks information that is protected from discovery by the  
13 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
14 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
15 not in UMC Group (USA)'s possession, custody or control.

16 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
17 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
18 identification and specificity, requiring subjective judgment and speculation, seeking information  
19 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
20 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
21 Rules of Civil Procedure, at least to the extent it seeks information about "Your manufacturing  
22 and/or fabrication tool and/or equipment," and about "any and all Infringing Instrumentalities."

23 UMC Group (USA) further objects to this Request as seeking information that is more  
24 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
25 extent it seeks information about "how You determine whether a manufacturing-related fault  
26 identified, detected, and/or determined to exist in Your manufacturing and/or fabrication tool  
27 and/or equipment ... requires You to remediate, rectify, cure, or correct such a fault."  
28

1 UMC Group (USA) further objects to this Request as seeking information that that is  
 2 available from one or more parties to the underlying action, and duplicative of other discovery  
 3 already taken or requested in the underlying action, at least to the extent it seeks information  
 4 about “any and all Infringing Instrumentalities.”

5 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
 6 confidential research, development, or commercial information, at least to the extent it seeks  
 7 information about “how You determine whether a manufacturing-related fault identified,  
 8 detected, and/or determined to exist in Your manufacturing and/or fabrication tool and/or  
 9 equipment ... requires You to remediate, rectify, cure, or correct such a fault,” and about “Your  
 10 manufacture, fabrication, and/or assembly of any and all Infringing Instrumentalities.” Any  
 11 production of information by UMC Group (USA) in response to the Subpoena will made  
 12 pursuant to the Protective Order governing the disclosure of confidential information in the  
 13 underlying action. UMC Group (USA) reserves the right to insist upon supplemental  
 14 protections.

15 Subject to and without waiving these specific objections and the foregoing General  
 16 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
 17 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
 18 documents.

19 **REQUEST NO. 40:**

20 Documents sufficient to show any fault detection analysis performed by You to identify,  
 21 detect, and/or determine manufacturing-related faults in Your manufacturing and/or fabrication  
 22 tool and/or equipment used for Your manufacture, fabrication, and/or assembly of any and all  
 23 Infringing Instrumentalities.

24 **OBJECTIONS AND RESPONSE TO REQUEST NO. 40:**

25 UMC Group (USA) incorporates each of its General Objections, Objections to  
 26 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
 27 objects to this Request to the extent it seeks information that is protected from discovery by the  
 28

1 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
2 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
3 not in UMC Group (USA)'s possession, custody or control.

4 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
5 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
6 identification and specificity, requiring subjective judgment and speculation, seeking information  
7 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
8 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
9 Rules of Civil Procedure, at least to the extent it seeks information about "Your manufacturing  
10 and/or fabrication tool and/or equipment," and about "any and all Infringing Instrumentalities."

11 UMC Group (USA) further objects to this Request as seeking information that is more  
12 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
13 extent it seeks information about "any fault detection analysis performed by You to identify,  
14 detect, and/or determine manufacturing-related faults in Your manufacturing and/or fabrication  
15 tool and/or equipment."

16 UMC Group (USA) further objects to this Request as seeking information that that is  
17 available from one or more parties to the underlying action, and duplicative of other discovery  
18 already taken or requested in the underlying action, at least to the extent it seeks information  
19 about "any and all Infringing Instrumentalities."

20 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
21 confidential research, development, or commercial information, at least to the extent it seeks  
22 information about "any fault detection analysis performed by You to identify, detect, and/or  
23 determine manufacturing-related faults in Your manufacturing and/or fabrication tool and/or  
24 equipment," and about "Your manufacture, fabrication, and/or assembly of any and all Infringing  
25 Instrumentalities." Any production of information by UMC Group (USA) in response to the  
26 Subpoena will be made pursuant to the Protective Order governing the disclosure of confidential  
27  
28

1 information in the underlying action. UMC Group (USA) reserves the right to insist upon  
2 supplemental protections.

3 Subject to and without waiving these specific objections and the foregoing General  
4 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
5 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
6 documents.

7 **REQUEST NO. 41:**

8 Documents sufficient to show any adjustment or modification to any fault detection  
9 analysis as described in Request for Production No. 40, including any adjustment or modification  
10 of any parameters that contribute to the identification, detection, and/or determination as to  
11 whether a manufacturing-related fault exists in Your manufacturing and/or fabrication tool  
12 and/or equipment used for Your manufacture, fabrication, and/or assembly of any and all  
13 Infringing Instrumentalities.

14 **OBJECTIONS AND RESPONSE TO REQUEST NO. 41:**

15 UMC Group (USA) incorporates each of its General Objections, Objections to  
16 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
17 objects to this Request to the extent it seeks information that is protected from discovery by the  
18 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
19 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
20 not in UMC Group (USA)'s possession, custody or control.

21 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
22 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
23 identification and specificity, requiring subjective judgment and speculation, seeking information  
24 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
25 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
26 Rules of Civil Procedure, at least to the extent it seeks information about "Your manufacturing  
27 and/or fabrication tool and/or equipment," and about "any and all Infringing Instrumentalities."  
28

1 UMC Group (USA) further objects to this Request as seeking information that is more  
2 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
3 extent it seeks information about “any adjustment or modification to any fault detection analysis  
4 as described in Request for Production No. 40,” and about “any adjustment or modification of  
5 any parameters that contribute to the identification, detection, and/or determination as to whether  
6 a manufacturing-related fault exists in Your manufacturing and/or fabrication tool and/or  
7 equipment.”

8 UMC Group (USA) further objects to this Request as seeking information that that is  
9 available from one or more parties to the underlying action, and duplicative of other discovery  
10 already taken or requested in the underlying action, at least to the extent it seeks information  
11 about “any and all Infringing Instrumentalities.”

12 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
13 confidential research, development, or commercial information, at least to the extent it seeks  
14 information about “any adjustment or modification to any fault detection analysis as described in  
15 Request for Production No. 40,” about “any adjustment or modification of any parameters that  
16 contribute to the identification, detection, and/or determination as to whether a manufacturing-  
17 related fault exists in Your manufacturing and/or fabrication tool and/or equipment,” and about  
18 “Your manufacture, fabrication, and/or assembly of any and all Infringing Instrumentalities.”  
19 Any production of information by UMC Group (USA) in response to the Subpoena will made  
20 pursuant to the Protective Order governing the disclosure of confidential information in the  
21 underlying action. UMC Group (USA) reserves the right to insist upon supplemental  
22 protections.

23 Subject to and without waiving these specific objections and the foregoing General  
24 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
25 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
26 documents.  
27  
28

**REQUEST NO. 42:**

Documents sufficient to show any use of a resist layer that is less than 2500 Angstroms thick by You for Your manufacture, fabrication, and/or assembly of any and all STMicro Infringing Instrumentalities and/or Infineon Infringing Instrumentalities.

**OBJECTIONS AND RESPONSE TO REQUEST NO. 42:**

UMC Group (USA) incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further objects to this Request to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC Group (USA) further objects to this Request to the extent it seeks information not in UMC Group (USA)'s possession, custody or control.

UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party's claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it seeks information about "any use of a resist layer that is less than 2500 Angstroms thick," and about "any and all STMicro Infringing Instrumentalities and/or Infineon Infringing Instrumentalities."

UMC Group (USA) further objects to this Request as seeking information that that is available from one or more parties to the underlying action, and duplicative of other discovery already taken or requested in the underlying action, at least to the extent it seeks information about "any and all STMicro Infringing Instrumentalities and/or Infineon Infringing Instrumentalities."

UMC Group (USA) further objects to this Request as seeking trade secret and/or other confidential research, development, or commercial information, at least to the extent it seeks information about "any use of a resist layer that is less than 2500 Angstroms thick by You," and

1 about “Your manufacture, fabrication, and/or assembly of any and all STMicro Infringing  
2 Instrumentalities and/or Infineon Infringing Instrumentalities.” Any production of information  
3 by UMC Group (USA) in response to the Subpoena will be made pursuant to the Protective Order  
4 governing the disclosure of confidential information in the underlying action. UMC Group  
5 (USA) reserves the right to insist upon supplemental protections.

6 Subject to and without waiving these specific objections and the foregoing General  
7 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
8 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
9 documents.

10 **REQUEST NO. 43:**

11 Documents relating to the importation into the United States and/or offer for sale, sale, or  
12 use within the United States of any and all systems, devices, components, and/or integrated  
13 circuits that are/were manufactured, fabricated, or assembled by You on behalf of any and all  
14 Defendants in connection with the use, utilization, installation, implementation, and/or  
15 deployment of the Manufacturing Equipment.

16 **OBJECTIONS AND RESPONSE TO REQUEST NO. 43:**

17 UMC Group (USA) incorporates each of its General Objections, Objections to  
18 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
19 objects to this Request to the extent it seeks information that is protected from discovery by the  
20 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
21 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
22 not in UMC Group (USA)’s possession, custody or control.

23 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
24 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
25 identification and specificity, requiring subjective judgment and speculation, seeking information  
26 that is not relevant to any party’s claim or defense and proportional to the needs of the case, and  
27 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
28

1 Rules of Civil Procedure, at least to the extent it seeks information about “any and all systems,  
2 devices, components, and/or integrated circuits that are/were manufactured, fabricated, or  
3 assembled by You on behalf of any and all Defendants.”

4 UMC Group (USA) further objects to this Request as seeking information that that is  
5 available from one or more parties to the underlying action, and duplicative of other discovery  
6 already taken or requested in the underlying action, at least to the extent it seeks information  
7 about “importation into the United States and/or offer for sale, sale, or use within the United  
8 States of any and all systems, devices, components, and/or integrated circuits that are/were  
9 manufactured, fabricated, or assembled by You on behalf of any and all Defendants.”

10 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
11 confidential research, development, or commercial information, at least to the extent it seeks  
12 information about “importation into the United States and/or offer for sale, sale, or use within the  
13 United States of any and all systems, devices, components, and/or integrated circuits that  
14 are/were manufactured, fabricated, or assembled by You on behalf of any and all Defendants,”  
15 and about “use, utilization, installation, implementation, and/or deployment of the Manufacturing  
16 Equipment.” Any production of information by UMC Group (USA) in response to the Subpoena  
17 will made pursuant to the Protective Order governing the disclosure of confidential information  
18 in the underlying action. UMC Group (USA) reserves the right to insist upon supplemental  
19 protections.

20 Subject to and without waiving these specific objections and the foregoing General  
21 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
22 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
23 documents.

24 **REQUEST NO. 44:**

25 Documents sufficient to show royalties You paid to any Equipment Manufacturers  
26 related to the use, utilization, installation, implementation, and/or deployment of the  
27 Manufacturing Equipment.  
28



**OBJECTIONS AND RESPONSE TO REQUEST NO. 44:**

UMC Group (USA) incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further objects to this Request to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC Group (USA) further objects to this Request to the extent it seeks information not in UMC Group (USA)'s possession, custody or control.

UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party's claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it seeks information about "any Equipment Manufacturers," and about "Manufacturing Equipment."

UMC Group (USA) further objects to this Request as seeking information that is more readily and/or appropriately available from, or confidential to, another non-party, at least to the extent it seeks information about "royalties You paid to any Equipment Manufacturers," and about "use, utilization, installation, implementation, and/or deployment of the Manufacturing Equipment."

UMC Group (USA) further objects to this Request as seeking trade secret and/or other confidential research, development, or commercial information, at least to the extent it seeks information about "royalties You paid to any Equipment Manufacturers," and about "use, utilization, installation, implementation, and/or deployment of the Manufacturing Equipment." Any production of information by UMC Group (USA) in response to the Subpoena will be made pursuant to the Protective Order governing the disclosure of confidential information in the underlying action. UMC Group (USA) reserves the right to insist upon supplemental protections.

1 Subject to and without waiving these specific objections and the foregoing General  
 2 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
 3 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
 4 documents.

5 **REQUEST NO. 45:**

6 All non-privileged Documents that refer to Ocean Semiconductor LLC or any of the  
 7 Actions, including communications between You and any Defendant and/or any third party such  
 8 as an Equipment Manufacturer that mention Ocean or any of the Actions.

9 **OBJECTIONS AND RESPONSE TO REQUEST NO. 45:**

10 UMC Group (USA) incorporates each of its General Objections, Objections to  
 11 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
 12 objects to this Request to the extent it seeks information that is protected from discovery by the  
 13 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
 14 immunity. UMC Group (USA) further objects to this Request to the extent it seeks information  
 15 not in UMC Group (USA)'s possession, custody or control.

16 UMC Group (USA) further objects to this Request as overbroad, vague and ambiguous,  
 17 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
 18 identification and specificity, requiring subjective judgment and speculation, seeking information  
 19 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
 20 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
 21 Rules of Civil Procedure, at least to the extent it seeks information about "[a]ll non-privileged  
 22 documents," about "any of the Actions," about "any Defendant," and about "any third party such  
 23 as an Equipment Manufacturer."

24 UMC Group (USA) further objects to this Request as seeking information that is more  
 25 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
 26 extent it seeks information about "communications between You and ... any third party such as  
 27 an Equipment Manufacturer."  
 28

1 UMC Group (USA) further objects to this Request as seeking information that that is  
 2 available from one or more parties to the underlying action, and duplicative of other discovery  
 3 already taken or requested in the underlying action, at least to the extent it seeks information  
 4 about “communications between You and any Defendant.”

5 UMC Group (USA) further objects to this Request as seeking trade secret and/or other  
 6 confidential research, development, or commercial information, at least to the extent it seeks  
 7 information about “non-privileged Documents that refer to Ocean Semiconductor LLC or any of  
 8 the Actions,” and about “communications between You and any Defendant and/or any third  
 9 party such as an Equipment Manufacturer that mention Ocean or any of the Actions.” Any  
 10 production of information by UMC Group (USA) in response to the Subpoena will made  
 11 pursuant to the Protective Order governing the disclosure of confidential information in the  
 12 underlying action. UMC Group (USA) reserves the right to insist upon supplemental  
 13 protections.

14 Subject to and without waiving these specific objections and the foregoing General  
 15 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA)  
 16 responds that following a reasonable search, it has no non-privileged, relevant, responsive  
 17 documents.

## 18 **SPECIFIC OBJECTIONS AND RESPONSES TO** 19 **DEPOSITION TOPICS**

### 20 **TOPIC NO. 1:**

21 Explanation of the context or content of the Documents that You produced in response to  
 22 the Requests for Production of Documents.

### 23 **OBJECTIONS AND RESPONSE TO TOPIC NO. 1:**

24 UMC Group (USA) incorporates each of its General Objections, Objections to  
 25 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
 26 objects to this Topic to the extent it seeks information that is protected from discovery by the  
 27 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
 28

1 immunity. UMC Group (USA) further objects to this Topic to the extent it seeks information not  
2 in UMC Group (USA)'s possession, custody or control.

3 UMC Group (USA) further objects to this Topic as overbroad, vague and ambiguous,  
4 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
5 identification and specificity, requiring subjective judgment and speculation, seeking information  
6 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
7 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
8 Rules of Civil Procedure, at least to the extent it refers to the Requests, for the same reasons as  
9 provided herein for each Request individually.

10 UMC Group (USA) further objects to this Topic as seeking information that is more  
11 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
12 extent it refers to the Requests, for the same reasons as provided herein for each Request  
13 individually.

14 UMC Group (USA) further objects to this Topic as seeking information that that is  
15 available from one or more parties to the underlying action, and duplicative of other discovery  
16 already taken or requested in the underlying action, at least to the extent it refers to the Requests,  
17 for the same reasons as provided herein for each Request individually.

18 UMC Group (USA) further objects to this Topic as seeking trade secret and/or other  
19 confidential research, development, or commercial information, at least to the extent it refers to  
20 the Requests, for the same reasons as provided herein for each Request individually. Any  
21 production of information by UMC Group (USA) in response to the Subpoena will made  
22 pursuant to the Protective Order governing the disclosure of confidential information in the  
23 underlying action. UMC Group (USA) reserves the right to insist upon supplemental  
24 protections.

25 Subject to and without waiving these specific objections and the foregoing General  
26 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA) states  
27 that it is willing to meet and confer with Ocean regarding the scope of this Topic.  
28

**TOPIC NO. 2:**

The source and authenticity of the Documents produced by You in response to the Requests for Production of Documents, including without limitation the processes, systems, persons and locations that are involved in creating, generating, storing, and/or maintaining any of the produced documents as business records.

**OBJECTIONS AND RESPONSE TO TOPIC NO. 2:**

UMC Group (USA) incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further objects to this Topic to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC Group (USA) further objects to this Topic to the extent it seeks information not in UMC Group (USA)'s possession, custody or control.

UMC Group (USA) further objects to this Topic as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party's claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it refers to the Requests, for the same reasons as provided herein for each Request individually.

UMC Group (USA) further objects to this Topic as seeking information that is more readily and/or appropriately available from, or confidential to, another non-party, at least to the extent it refers to the Requests, for the same reasons as provided herein for each Request individually.

UMC Group (USA) further objects to this Topic as seeking information that that is available from one or more parties to the underlying action, and duplicative of other discovery already taken or requested in the underlying action, at least to the extent it refers to the Requests, for the same reasons as provided herein for each Request individually.

1 UMC Group (USA) further objects to this Topic as seeking trade secret and/or other  
 2 confidential research, development, or commercial information, at least to the extent it refers to  
 3 the Requests, for the same reasons as provided herein for each Request individually. Any  
 4 production of information by UMC Group (USA) in response to the Subpoena will made  
 5 pursuant to the Protective Order governing the disclosure of confidential information in the  
 6 underlying action. UMC Group (USA) reserves the right to insist upon supplemental  
 7 protections.

8 Subject to and without waiving these specific objections and the foregoing General  
 9 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA) states  
 10 that it is willing to meet and confer with Ocean regarding the scope of this Topic.

11 **TOPIC NO. 3:**

12 The extent and scope of use of any and all Manufacturing Equipment that is/was used,  
 13 utilized, installed, implemented or deployed by You in connection with the manufacture,  
 14 fabrication, and/or assembly of the Infringing Instrumentalities, including any and all contracts  
 15 and/or agreements between You and Equipment Manufacturers relating to the use, utilization,  
 16 installation, implementation, and/or deployment of the Manufacturing Equipment at Your  
 17 manufacturing and/or fabrication facilities.

18 **OBJECTIONS AND RESPONSE TO TOPIC NO. 3:**

19 UMC Group (USA) incorporates each of its General Objections, Objections to  
 20 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
 21 objects to this Topic to the extent it seeks information that is protected from discovery by the  
 22 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
 23 immunity. UMC Group (USA) further objects to this Topic to the extent it seeks information not  
 24 in UMC Group (USA)'s possession, custody or control.

25 UMC Group (USA) further objects to this Topic as overbroad, vague and ambiguous,  
 26 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
 27 identification and specificity, requiring subjective judgment and speculation, seeking information  
 28

1 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
2 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
3 Rules of Civil Procedure, at least to the extent it seeks information about "any and all  
4 Manufacturing Equipment," about "Infringing Instrumentalities," about "Equipment  
5 Manufacturers," about "any and all contracts and/or agreements," and about "Your  
6 manufacturing and/or fabrication facilities."

7 UMC Group (USA) further objects to this Topic as seeking information that is more  
8 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
9 extent it seeks information about "Manufacturing Equipment," and about "any and all contracts  
10 and/or agreements between You and Equipment Manufacturers."

11 UMC Group (USA) further objects to this Topic as seeking information that that is  
12 available from one or more parties to the underlying action, and duplicative of other discovery  
13 already taken or requested in the underlying action, at least to the extent it seeks information  
14 about "Infringing Instrumentalities."

15 UMC Group (USA) further objects to this Topic as seeking trade secret and/or other  
16 confidential research, development, or commercial information, at least to the extent it seeks  
17 information about "[t]he extent and scope of use of any and all Manufacturing Equipment that  
18 is/was used, utilized, installed, implemented or deployed by You," about "the manufacture,  
19 fabrication, and/or assembly of the Infringing Instrumentalities," about "any and all contracts  
20 and/or agreements between You and Equipment Manufacturers," and about "use, utilization,  
21 installation, implementation, and/or deployment of the Manufacturing Equipment at Your  
22 manufacturing and/or fabrication facilities." Any production of information by UMC Group  
23 (USA) in response to the Subpoena will be made pursuant to the Protective Order governing the  
24 disclosure of confidential information in the underlying action. UMC Group (USA) reserves the  
25 right to insist upon supplemental protections.

26 Subject to and without waiving these specific objections and the foregoing General  
27 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA) states  
28



1 that the information sought by this Topic is not known or reasonably available to UMC Group  
 2 (USA), and therefore there is no officer, director, managing agent, or other person at UMC  
 3 Group (USA) who can be designated to testify on UMC Group (USA)'s behalf about this Topic.

4 **TOPIC NO. 4:**

5 Your use, utilization, installation, implementation, deployment, operation, testing,  
 6 qualification, configuration, and maintenance of any and all Manufacturing Equipment, and/or  
 7 any in-house or proprietary tool and/or equipment used in your manufacturing and/or facility to  
 8 manufacture, fabricate, and/or assemble the Infringing Instrumentalities.

9 **OBJECTIONS AND RESPONSE TO TOPIC NO. 4:**

10 UMC Group (USA) incorporates each of its General Objections, Objections to  
 11 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
 12 objects to this Topic to the extent it seeks information that is protected from discovery by the  
 13 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
 14 immunity. UMC Group (USA) further objects to this Topic to the extent it seeks information not  
 15 in UMC Group (USA)'s possession, custody or control.

16 UMC Group (USA) further objects to this Topic as overbroad, vague and ambiguous,  
 17 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
 18 identification and specificity, requiring subjective judgment and speculation, seeking information  
 19 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
 20 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
 21 Rules of Civil Procedure, at least to the extent it seeks information about "any and all  
 22 Manufacturing Equipment," about "any in-house or proprietary tool and/or equipment ," about  
 23 "your manufacturing and/or facility ," and about "Infringing Instrumentalities."

24 UMC Group (USA) further objects to this Topic as seeking information that is more  
 25 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
 26 extent it seeks information about "any and all Manufacturing Equipment."  
 27  
 28



1 UMC Group (USA) further objects to this Topic as seeking information that that is  
 2 available from one or more parties to the underlying action, and duplicative of other discovery  
 3 already taken or requested in the underlying action, at least to the extent it seeks information  
 4 about “Infringing Instrumentalities.”

5 UMC Group (USA) further objects to this Topic as seeking trade secret and/or other  
 6 confidential research, development, or commercial information, at least to the extent it seeks  
 7 information about “Your use, utilization, installation, implementation, deployment, operation,  
 8 testing, qualification, configuration, and maintenance of any and all Manufacturing Equipment,”  
 9 and about “any in-house or proprietary tool and/or equipment used in your manufacturing and/or  
 10 facility.” Any production of information by UMC Group (USA) in response to the Subpoena  
 11 will be made pursuant to the Protective Order governing the disclosure of confidential information  
 12 in the underlying action. UMC Group (USA) reserves the right to insist upon supplemental  
 13 protections.

14 Subject to and without waiving these specific objections and the foregoing General  
 15 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA) states  
 16 that the information sought by this Topic is not known or reasonably available to UMC Group  
 17 (USA), and therefore there is no officer, director, managing agent, or other person at UMC  
 18 Group (USA) who can be designated to testify on UMC Group (USA)’s behalf about this Topic.

19 **TOPIC NO. 5:**

20 Manufacturing facilities owned, controlled or operated by or on Your behalf or Your  
 21 subsidiaries where the Manufacturing Equipment is/was used, utilized, installed, implemented  
 22 and/or deployed.

23 **OBJECTIONS AND RESPONSE TO TOPIC NO. 5:**

24 UMC Group (USA) incorporates each of its General Objections, Objections to  
 25 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
 26 objects to this Topic to the extent it seeks information that is protected from discovery by the  
 27 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
 28

1 immunity. UMC Group (USA) further objects to this Topic to the extent it seeks information not  
2 in UMC Group (USA)'s possession, custody or control.

3 UMC Group (USA) further objects to this Topic as overbroad, vague and ambiguous,  
4 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
5 identification and specificity, requiring subjective judgment and speculation, seeking information  
6 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
7 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
8 Rules of Civil Procedure, at least to the extent it seeks information about "Manufacturing  
9 facilities owned, controlled or operated by or on Your behalf or Your subsidiaries," and about  
10 "Manufacturing Equipment."

11 UMC Group (USA) further objects to this Request as seeking information that is more  
12 readily and/or appropriately available from, or confidential to, another non-party, at least to the  
13 extent it seeks information about "Manufacturing Equipment."

14 UMC Group (USA) further objects to this Topic as seeking trade secret and/or other  
15 confidential research, development, or commercial information, at least to the extent it seeks  
16 information about "Manufacturing facilities ... where the Manufacturing Equipment is/was used,  
17 utilized, installed, implemented and/or deployed." Any production of information by UMC  
18 Group (USA) in response to the Subpoena will be made pursuant to the Protective Order governing  
19 the disclosure of confidential information in the underlying action. UMC Group (USA) reserves  
20 the right to insist upon supplemental protections.

21 Subject to and without waiving these specific objections and the foregoing General  
22 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA) states  
23 that the information sought by this Topic is not known or reasonably available to UMC Group  
24 (USA), and therefore there is no officer, director, managing agent, or other person at UMC  
25 Group (USA) who can be designated to testify on UMC Group (USA)'s behalf about this Topic.  
26  
27  
28

**TOPIC NO. 6:**

Any making, using, selling, or offers to sell the Infringing Instrumentalities within the United States, or importing into the United States of the Infringing Instrumentalities, including any and all contracts and/or agreements between You and any and all Defendants governing Your making, using, selling, offering to sell, or importation of the Infringing Instrumentalities.

**OBJECTIONS AND RESPONSE TO TOPIC NO. 6:**

UMC Group (USA) incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further objects to this Topic to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC Group (USA) further objects to this Topic to the extent it seeks information not in UMC Group (USA)'s possession, custody or control.

UMC Group (USA) further objects to this Topic as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party's claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it seeks information about "Infringing Instrumentalities," about "any and all contracts and/or agreements," and about "any and all Defendants."

UMC Group (USA) further objects to this Topic as seeking information that that is available from one or more parties to the underlying action, and duplicative of other discovery already taken or requested in the underlying action, at least to the extent it seeks information about "[a]ny making, using, selling, or offers to sell the Infringing Instrumentalities within the United States," about "importing into the United States of the Infringing Instrumentalities," and about "any and all contracts and/or agreements between You and any and all Defendants."

1 UMC Group (USA) further objects to this Topic as seeking trade secret and/or other  
 2 confidential research, development, or commercial information, at least to the extent it seeks  
 3 information about “[a]ny making, using, selling, or offers to sell the Infringing Instrumentalities  
 4 within the United States ,” about “importing into the United States of the Infringing  
 5 Instrumentalities,” about “any and all contracts and/or agreements between You and any and all  
 6 Defendants,” and about “Your making, using, selling, offering to sell, or importation of the  
 7 Infringing Instrumentalities.” Any production of information by UMC Group (USA) in response  
 8 to the Subpoena will made pursuant to the Protective Order governing the disclosure of  
 9 confidential information in the underlying action. UMC Group (USA) reserves the right to insist  
 10 upon supplemental protections.

11 Subject to and without waiving these specific objections and the foregoing General  
 12 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA) states  
 13 that the information sought by this Topic is not known or reasonably available to UMC Group  
 14 (USA), and therefore there is no officer, director, managing agent, or other person at UMC  
 15 Group (USA) who can be designated to testify on UMC Group (USA)’s behalf about this Topic.

16 **TOPIC NO. 7:**

17 Your first awareness of the Asserted Patents.

18 **OBJECTIONS AND RESPONSE TO TOPIC NO. 7:**

19 UMC Group (USA) incorporates each of its General Objections, Objections to  
 20 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
 21 objects to this Topic to the extent it seeks information that is protected from discovery by the  
 22 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
 23 immunity. UMC Group (USA) further objects to this Topic to the extent it seeks information not  
 24 in UMC Group (USA)’s possession, custody or control.

25 UMC Group (USA) further objects to this Topic as overbroad, vague and ambiguous,  
 26 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
 27 identification and specificity, requiring subjective judgment and speculation, seeking information  
 28

1 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
 2 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
 3 Rules of Civil Procedure, at least because UMC Group (USA) is not a defendant in the  
 4 underlying action.

5 Subject to and without waiving these specific objections and the foregoing General  
 6 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA) states  
 7 that the information sought by this Topic is not known or reasonably available to UMC Group  
 8 (USA) or otherwise protected from discovery by the attorney-client privilege, the attorney work-  
 9 product doctrine, and the common interest doctrine, and therefore there is no officer, director,  
 10 managing agent, or other person at UMC Group (USA) who can be designated to testify on  
 11 UMC Group (USA)'s behalf about this Topic.

12 **TOPIC NO. 8:**

13 The means by which You identify each of the Infringing Instrumentalities, including, but  
 14 not limited to, any internal or external reference or part numbers used to identify such  
 15 Instrumentalities when sold to, or made for, any Defendant.

16 **OBJECTIONS AND RESPONSE TO TOPIC NO. 8:**

17 UMC Group (USA) incorporates each of its General Objections, Objections to  
 18 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
 19 objects to this Topic to the extent it seeks information that is protected from discovery by the  
 20 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
 21 immunity. UMC Group (USA) further objects to this Topic to the extent it seeks information not  
 22 in UMC Group (USA)'s possession, custody or control.

23 UMC Group (USA) further objects to this Topic as overbroad, vague and ambiguous,  
 24 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
 25 identification and specificity, requiring subjective judgment and speculation, seeking information  
 26 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
 27 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
 28

1 Rules of Civil Procedure, at least to the extent it seeks information about “Infringing  
2 Instrumentalities,” and about “any Defendant.”

3 UMC Group (USA) further objects to this Topic as seeking information that that is  
4 available from one or more parties to the underlying action, and duplicative of other discovery  
5 already taken or requested in the underlying action, at least to the extent it seeks information  
6 about “Infringing Instrumentalities,” and about “any internal or external reference or part  
7 numbers used to identify such Instrumentalities.”

8 UMC Group (USA) further objects to this Topic as seeking trade secret and/or other  
9 confidential research, development, or commercial information, at least to the extent it seeks  
10 information about “[t]he means by which You identify each of the Infringing Instrumentalities,”  
11 about “any internal or external reference or part numbers used to identify such Instrumentalities.”  
12 Any production of information by UMC Group (USA) in response to the Subpoena will made  
13 pursuant to the Protective Order governing the disclosure of confidential information in the  
14 underlying action. UMC Group (USA) reserves the right to insist upon supplemental  
15 protections.

16 Subject to and without waiving these specific objections and the foregoing General  
17 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA) states  
18 that the information sought by this Topic is not known or reasonably available to UMC Group  
19 (USA), and therefore there is no officer, director, managing agent, or other person at UMC  
20 Group (USA) who can be designated to testify on UMC Group (USA)’s behalf about this Topic.

21 **TOPIC NO. 9:**

22 Revenue, costs and profits that You derive from the manufacture, fabrication, and/or  
23 assembly of the Infringing Instrumentalities.

24 **OBJECTIONS AND RESPONSE TO TOPIC NO. 9:**

25 UMC Group (USA) incorporates each of its General Objections, Objections to  
26 Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further  
27 objects to this Topic to the extent it seeks information that is protected from discovery by the  
28

1 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or  
2 immunity. UMC Group (USA) further objects to this Topic to the extent it seeks information not  
3 in UMC Group (USA)'s possession, custody or control.

4 UMC Group (USA) further objects to this Topic as overbroad, vague and ambiguous,  
5 imposing undue burden and expense, calling for a legal conclusion, providing insufficient  
6 identification and specificity, requiring subjective judgment and speculation, seeking information  
7 that is not relevant to any party's claim or defense and proportional to the needs of the case, and  
8 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal  
9 Rules of Civil Procedure, at least to the extent it seeks information about "Infringing  
10 Instrumentalities."

11 UMC Group (USA) further objects to this Topic as seeking information that that is  
12 available from one or more parties to the underlying action, and duplicative of other discovery  
13 already taken or requested in the underlying action, at least to the extent it seeks information  
14 about "Infringing Instrumentalities."

15 UMC Group (USA) further objects to this Topic as seeking trade secret and/or other  
16 confidential research, development, or commercial information, at least to the extent it seeks  
17 information about "[r]evenue, costs and profits that You derive," and about "the manufacture,  
18 fabrication, and/or assembly of the Infringing Instrumentalities." Any production of information  
19 by UMC Group (USA) in response to the Subpoena will made pursuant to the Protective Order  
20 governing the disclosure of confidential information in the underlying action. UMC Group  
21 (USA) reserves the right to insist upon supplemental protections.

22 Subject to and without waiving these specific objections and the foregoing General  
23 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA) states  
24 that the information sought by this Topic is not known or reasonably available to UMC Group  
25 (USA), and therefore there is no officer, director, managing agent, or other person at UMC  
26 Group (USA) who can be designated to testify on UMC Group (USA)'s behalf about this Topic.  
27  
28



**TOPIC NO. 10:**

Your customers, other than Defendants, whose products are/were manufactured, fabricated, and/or assembled using any and all Manufacturing Equipment.

**OBJECTIONS AND RESPONSE TO TOPIC NO. 10:**

UMC Group (USA) incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further objects to this Topic to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC Group (USA) further objects to this Topic to the extent it seeks information not in UMC Group (USA)'s possession, custody or control.

UMC Group (USA) further objects to this Topic as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party's claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it seeks information about "Your customers, other than Defendants," and about "any and all Manufacturing Equipment."

UMC Group (USA) further objects to this Topic as seeking trade secret and/or other confidential research, development, or commercial information, at least to the extent it seeks information about "[y]our customers, other than Defendants." Any production of information by UMC Group (USA) in response to the Subpoena will be made pursuant to the Protective Order governing the disclosure of confidential information in the underlying action. UMC Group (USA) reserves the right to insist upon supplemental protections.

Subject to and without waiving these specific objections and the foregoing General Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA) states that the information sought by this Topic is not known or reasonably available to UMC Group



(USA), and therefore there is no officer, director, managing agent, or other person at UMC Group (USA) who can be designated to testify on UMC Group (USA)'s behalf about this Topic.

**TOPIC NO. 11:**

Any communications between You and any Equipment Manufacturer or any of the Defendants concerning these Actions, Ocean, the Asserted Patents, or any of the Infringing Instrumentalities.

**OBJECTIONS AND RESPONSE TO TOPIC NO. 11:**

UMC Group (USA) incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC Group (USA) further objects to this Topic to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC Group (USA) further objects to this Topic to the extent it seeks information not in UMC Group (USA)'s possession, custody or control.

UMC Group (USA) further objects to this Topic as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party's claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it seeks information about "any Equipment Manufacturer," about "any of the Defendants," and about "any of the Infringing Instrumentalities."

UMC Group (USA) further objects to this Topic as seeking information that is more readily and/or appropriately available from, or confidential to, another non-party, at least to the extent it seeks information about "[a]ny communications between You and any Equipment Manufacturer," and about "any of the infringing Instrumentalities."

UMC Group (USA) further objects to this Topic as seeking information that that is available from one or more parties to the underlying action, and duplicative of other discovery

1 already taken or requested in the underlying action, at least to the extent it seeks information  
2 about “[a]ny communications between You and ... any of the Defendants.”

3 UMC Group (USA) further objects to this Topic as seeking trade secret and/or other  
4 confidential research, development, or commercial information, at least to the extent it seeks  
5 information about “any of the Infringing Instrumentalities.” Any production of information by  
6 UMC Group (USA) in response to the Subpoena will be made pursuant to the Protective Order  
7 governing the disclosure of confidential information in the underlying action. UMC Group  
8 (USA) reserves the right to insist upon supplemental protections.

9 Subject to and without waiving these specific objections and the foregoing General  
10 Objections, Objections to Definitions, and Objections to Instructions, UMC Group (USA) states  
11 that the information sought by this Topic is not known or reasonably available to UMC Group  
12 (USA) or otherwise protected from discovery by the attorney-client privilege, the attorney work-  
13 product doctrine, and the common interest doctrine, and therefore there is no officer, director,  
14 managing agent, or other person at UMC Group (USA) who can be designated to testify on  
15 UMC Group (USA)’s behalf about this Topic.

16  
17 DATED: January 14, 2022

By: /s/ Robert G. Litts

18  
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28

**CERTIFICATE OF SERVICE**

I, Robert G. Litts, hereby certify that on January 14, 2022, I caused a true and correct copy of the foregoing document to be served on counsel listed below via electronic mail and U.S. Mail:

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